

Jayla Allen, et al. vs. Waller County Texas, et al.
Treasure Smith - 10/10/2019

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<p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE SOUTHERN DISTRICT OF TEXAS 3 HOUSTON DIVISION</p> <p>3 JAYLA ALLEN, DAMON) JOHNSON, TREASURE SMITH,) 4 AND THE PANTHER PARTY,) Plaintiffs,)</p> <p>5 VS.) CIVIL ACTION NO.: 6) 4:18-CV-3985</p> <p>7 WALLER COUNTY TEXAS; THE) WALLER COUNTY) 8 COMMISSIONERS COURT;) JUDGE CARBETT "TREY" J.) 9 DUHON III, IN HIS) OFFICIAL CAPACITY AS THE) 10 WALLER COUNTY JUDGE; AND) CHRISTY A. EASON, IN HER) OFFICIAL CAPACITY AS THE) 11 WALLER COUNTY ELECTIONS) ADMINISTRATOR,) 12 Defendants.)</p> <p>13 ***** 14 ORAL DEPOSITION OF TREASURE SMITH 15 OCTOBER 10, 2019 *****</p> <p>16 ORAL DEPOSITION OF TREASURE SMITH, produced as 17 a witness at the instance of the Defendants and duly 18 sworn, was taken in the above-styled and numbered cause 19 on OCTOBER 10, 2019, from 2:40 p.m. to 5:26 p.m., before 20 SHERRI SANTMAN FISHER, Certified Shorthand Reporter in 21 and for the State of Texas, reported by machine 22 shorthand, at the University Square Clubhouse, 502 Anne 23 Preston Street, Prairie View, Texas, pursuant to the 24 Federal Rules of Civil Procedure and the provisions 25 stated on the record or attached hereto.</p>	<p>1 INDEX</p> <p>2 PAGE</p> <p>3 Appearances 2</p> <p>4 Stipulations 4</p> <p>5 Examination by Mr. Seaquist 4 2:40 p.m. - 3:00 p.m. 3:05 p.m. - 3:53 p.m. 6 4:16 p.m. - 4:38 p.m. 4:42 p.m. - 5:00 p.m. 7 5:09 p.m. - 5:11 p.m.</p> <p>8 Examination by Ms. Harrison 90 5:11 p.m. - 5:26 p.m.</p> <p>9</p> <p>10 Changes and Corrections 104</p> <p>11 Signature 105</p> <p>12 Reporter's Certification 106</p> <p>13 EXHIBIT INDEX</p> <p>14 NO. DESCRIPTION PAGE</p> <p>15 1 Plaintiff Treasure Smith's Response and 17 Objections to Defendant Waller County's 16 First Set of Interrogatories</p> <p>17 2 Prairie View A&M University Map 20</p> <p>18 3 Google Map 51</p> <p>19 4 Course Schedule 58</p> <p>20 5 Twitter Post Dated October 25, 2018 76</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1 APPEARANCES</p> <p>2</p> <p>3 FOR THE PLAINTIFFS:</p> <p>4 MS. LEAH ADEN MR. JOHN CUSICK 5 NAACP LEGAL DEFENSE AND EDUCATIONAL FUND, INC. 40 Rector Street 6 Fifth Floor New York, New York 10006-1738 7 212-965-7715/212-226-7592 (fax) laden@naacpldf.org 8 jcusick@naacpldf.org 9 MS. JULIE GOODRICH HARRISON NORTON ROSE FULBRIGHT US LLP 10 1301 McKinney Suite 5100 11 Houston, Texas 77010-3095 713-651-5151/713-651-5246 (fax) julie.harrison@nortonrosefulbright.com</p> <p>12</p> <p>13 FOR THE DEFENDANTS:</p> <p>14 MR. GUNNAR P. SEAQUIST BICKERSTAFF HEATH DELGADO ACOSTA LLP 15 3711 South Mopac Expressway Building 1, Suite 300 Austin, Texas 78746 16 512-472-8021/512-320-5638 (fax) gseaquist@bickerstaff.com</p> <p>17</p> <p>18 MS. ELIZABETH DORSEY WALLER COUNTY DISTRICT ATTORNEY'S OFFICE 19 645 12th Street Hempstead, Texas 77445 20 979-826-7718/979-826-7722 (fax) e.dorsey@wallercounty.us</p> <p>21</p> <p>22 ALSO PRESENT:</p> <p>23 Steven Lance</p> <p>24</p> <p>25</p>	<p>1 (Witness sworn)</p> <p>2 MR. SEAQUIST: Okay. Before we get</p> <p>3 started, for the record, counsel have conferred prior to</p> <p>4 the deposition and we're going to agree to waive the</p> <p>5 reading requirements under Federal Rule Civil -- Federal</p> <p>6 Rule of Civil Procedure 30(b)(5).</p> <p>7 MS. HARRISON: That's correct.</p> <p>8 MR. SEAQUIST: And for purposes of the</p> <p>9 deposition, I think we've also agreed that objection,</p> <p>10 form, will be sufficient to preserve any form</p> <p>11 objections.</p> <p>12 MS. HARRISON: Yes, we agree to that.</p> <p>13 MR. SEAQUIST: Okay.</p> <p>14 TREASURE SMITH,</p> <p>15 having been first duly sworn, testified as follows:</p> <p>16 EXAMINATION</p> <p>17 BY MR. SEAQUIST:</p> <p>18 Q. Good afternoon, Ms. Smith. My name is Gunnar</p> <p>19 Seaquist. I don't think you and I have met before</p> <p>20 today. Is that right?</p> <p>21 A. Like two minutes ago.</p> <p>22 Q. Okay.</p> <p>23 A. Okay. Yeah. Didn't we shake hands? Your hand</p> <p>24 was cold.</p> <p>25 Q. That's right.</p>

PLAINTIFF'S
EXHIBIT

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<p style="text-align: right;">Page 5</p> <p>1 I represent the defendants in the lawsuit</p> <p>2 in which you are a named plaintiff. Do you understand</p> <p>3 that?</p> <p>4 A. Yes, sir.</p> <p>5 Q. Okay. Have you ever given a deposition before?</p> <p>6 A. No, sir.</p> <p>7 Q. All right. We will go over just a few -- a few</p> <p>8 of the guidelines.</p> <p>9 We have our court reporter here today. I</p> <p>10 talk too fast, so I'm going to talk a little more slowly</p> <p>11 if I can. But we need her to be able to take down</p> <p>12 everything that you and I say to each other.</p> <p>13 And so if you will do your very best,</p> <p>14 please, to wait until I ask my full question before you</p> <p>15 start your answer and I am going to do my very best to</p> <p>16 wait until you've given your full answer before I ask my</p> <p>17 next question. That way, we're not talking over each</p> <p>18 other. Okay?</p> <p>19 A. Okay.</p> <p>20 Q. Also, when we're just talking without a court</p> <p>21 reporter, we'll often use nonverbal cues, headshakes,</p> <p>22 head nods. We use uh-huh or huh-uh. On the transcript</p> <p>23 those things don't come out. And so I need you to</p> <p>24 answer out loud verbally and with yeses or nos where</p> <p>25 appropriate.</p>	<p style="text-align: right;">Page 7</p> <p>1 the record, please?</p> <p>2 A. Treasure Smith.</p> <p>3 Q. Okay. Ms. Smith, is there any reason that you</p> <p>4 would be unable to understand or truthfully answer any</p> <p>5 of my questions today?</p> <p>6 A. No, sir.</p> <p>7 Q. For example, are you taking any medications</p> <p>8 that would impair your ability to understand my</p> <p>9 questions?</p> <p>10 A. No, sir.</p> <p>11 Q. Okay. And are you ready to proceed with the</p> <p>12 deposition today?</p> <p>13 A. Yes, sir.</p> <p>14 Q. What have you done to prepare for the</p> <p>15 deposition today?</p> <p>16 A. Met with my attorneys.</p> <p>17 Q. Okay. When you say your attorneys, are you</p> <p>18 talking about the lawyers that are in the room today?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Okay. And that's Julie Harrison from the</p> <p>21 Norton-Rose law firm, correct?</p> <p>22 A. Yes, sir.</p> <p>23 Q. And then we have Leah Aden, John Cusick, and</p> <p>24 Steven Lance from the NAACP Legal Defense Fund.</p> <p>25 A. Yes, sir.</p>
<p style="text-align: right;">Page 6</p> <p>1 If for some reason you don't do that, I'll</p> <p>2 kind of prod you for a yes or a no. I'm not trying to</p> <p>3 be rude. I'm just trying to get a good record. Okay?</p> <p>4 A. Okay.</p> <p>5 Q. Okay. The other thing is we've been at this</p> <p>6 for a while now, so I guarantee you that at some point</p> <p>7 this afternoon I'm going to ask you a question that's</p> <p>8 poorly worded or doesn't make sense for some reason.</p> <p>9 If I do that, please can we have an</p> <p>10 understanding -- or if you don't understand my question,</p> <p>11 can we have an agreement that you'll ask me to clarify?</p> <p>12 A. Okay.</p> <p>13 Q. Okay. And can we also have an agreement then</p> <p>14 that if you do answer one of my questions, you</p> <p>15 understood it and gave the best answer you could?</p> <p>16 A. Uh-huh. I mean, yes. Sorry. You said don't</p> <p>17 say uh-huh.</p> <p>18 Q. It happens to us all.</p> <p>19 Also, this is not a marathon. If you need</p> <p>20 a break at any point, just let me know. We can take a</p> <p>21 break. I would just ask that if there's a question on</p> <p>22 the table that you answer that question and then we'll</p> <p>23 take a break. Okay?</p> <p>24 A. Okay.</p> <p>25 Q. All right. Will you give us your full name for</p>	<p style="text-align: right;">Page 8</p> <p>1 Q. All right. You were able to meet with all of</p> <p>2 them prior to your deposition?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Okay. About how long would you say you spent</p> <p>5 meeting with counsel before the deposition today?</p> <p>6 A. 30 minutes to an hour, 45. I would say about</p> <p>7 45 minutes.</p> <p>8 Q. In addition to meeting with counsel, did you</p> <p>9 review any documents before the deposition?</p> <p>10 A. Yes.</p> <p>11 Q. What did you look at?</p> <p>12 A. This. It's just transcripts, things that I had</p> <p>13 to get notarized earlier, this here.</p> <p>14 Q. Okay. Are those the interrogatory responses or</p> <p>15 the responses to some questions that we had asked for</p> <p>16 you to answer as a plaintiff in this case?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Okay. And you swore to the truth of the</p> <p>19 statements you gave in those responses?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Other than your interrogatory responses, is</p> <p>22 there any -- are there any other documents that you have</p> <p>23 reviewed before the deposition today?</p> <p>24 A. No, sir.</p> <p>25 Q. Did you prepare any documents or make any</p>

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<p>1 written notes --</p> <p>2 A. No.</p> <p>3 Q. -- in anticipation of your deposition today?</p> <p>4 A. No.</p> <p>5 Q. Okay. Before we talk about the substance of</p> <p>6 the case, I'm just going to get a little bit of</p> <p>7 background about you.</p> <p>8 Can you tell me where -- or what year you</p> <p>9 were born, please?</p> <p>10 A. 1998.</p> <p>11 Q. And where were you born?</p> <p>12 A. Houston, Texas.</p> <p>13 Q. Did you grow up in Houston?</p> <p>14 A. Yes, sir.</p> <p>15 Q. What area of Houston?</p> <p>16 A. Houston is a city, so like I don't know --</p> <p>17 like --</p> <p>18 Q. Any particular -- north, south, east, west?</p> <p>19 A. South.</p> <p>20 Q. South Houston?</p> <p>21 Do you have any siblings?</p> <p>22 A. Yes.</p> <p>23 Q. How many?</p> <p>24 A. Four.</p> <p>25 Q. Are they older, younger, all of the above?</p>	<p>1 first generation to go to college?</p> <p>2 A. No.</p> <p>3 Q. Okay. You have one of your older siblings that</p> <p>4 went to college?</p> <p>5 A. No.</p> <p>6 Q. Okay. Who else has gone to college in your</p> <p>7 family?</p> <p>8 A. My grandma. Wait. Does she count nuclear?</p> <p>9 Q. Did she go to Prairie View A&M?</p> <p>10 A. No.</p> <p>11 Q. Okay. She certainly counts, but --</p> <p>12 A. Huh?</p> <p>13 Q. What did you -- what does your father do for a</p> <p>14 living?</p> <p>15 A. I don't know. He's out of the picture.</p> <p>16 Q. Okay. What about your mom?</p> <p>17 A. She's a realtor.</p> <p>18 Q. Where did you attend high school?</p> <p>19 A. Willowridge High School.</p> <p>20 Q. Can you spell that for me?</p> <p>21 A. W-i-l-l-o-w-r-i-d-g-e.</p> <p>22 Q. What year did you graduate?</p> <p>23 A. 2017.</p> <p>24 Q. And when did you start at Prairie View A&M?</p> <p>25 A. The summer of 2017, in June -- sorry. I was</p>
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<p>1 A. All of the above. One older and three younger.</p> <p>2 Q. Have any of your siblings attended Prairie View</p> <p>3 A&M ahead of you?</p> <p>4 A. No.</p> <p>5 Q. Throughout the deposition today I may say</p> <p>6 Prairie View A&M or I may say PVAMU. Do you understand</p> <p>7 what we're talking about when I say those things?</p> <p>8 A. Uh-huh. Yes. Sorry.</p> <p>9 Q. Either of your parents alumni at Prairie View</p> <p>10 A&M?</p> <p>11 A. No, sir.</p> <p>12 Q. Anybody else in your family go to Prairie View</p> <p>13 A&M before you?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Who is that?</p> <p>16 A. A cousin.</p> <p>17 Q. Do you know what year your cousin graduated?</p> <p>18 A. The year before last year, so that was 2018.</p> <p>19 Q. So 2017?</p> <p>20 A. I think it was 2018. 2018.</p> <p>21 Q. That sounds right.</p> <p>22 A. Sorry. That was last year.</p> <p>23 Q. Do your parents have college degrees?</p> <p>24 A. No.</p> <p>25 Q. Okay. In your nuclear family, are you the</p>	<p>1 still trying to figure it out in my head because it was</p> <p>2 summer program. I think it was -- it was June, I think.</p> <p>3 Q. Did you attend summer school?</p> <p>4 A. They had a program for incoming freshmen and</p> <p>5 everything was paid for.</p> <p>6 Q. Okay. And so where did you stay for that</p> <p>7 summer program?</p> <p>8 A. In the dorm rooms.</p> <p>9 Q. Which dorm was it?</p> <p>10 A. 45. I don't know like if it had a name. Just</p> <p>11 45. It was Building 45.</p> <p>12 Q. So that was starting in June of 2017?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Have you declared a major?</p> <p>15 A. Yes, sir.</p> <p>16 Q. What is your major?</p> <p>17 A. Criminal justice.</p> <p>18 Q. And are you a junior this year?</p> <p>19 A. Yes, sir.</p> <p>20 Q. How did you choose Prairie View as the</p> <p>21 university you wanted to attend?</p> <p>22 A. Based off of the cost. It wasn't that pricey.</p> <p>23 It wasn't too far from home and it wasn't too close.</p> <p>24 And they gave me a lot of money -- well, not a lot of</p> <p>25 money, but it was paid for. A good portion of it was</p>

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<p>1 paid for.</p> <p>2 Q. You got some scholarship?</p> <p>3 A. Yeah, and grant money, too.</p> <p>4 Q. To your knowledge, has anybody else in your</p> <p>5 family ever lived in Waller County?</p> <p>6 A. No, sir.</p> <p>7 Q. Well, you said you had the one cousin who went</p> <p>8 to Prairie View, but I guess other than that?</p> <p>9 A. Yeah, but she didn't live here. She was older,</p> <p>10 so she commuted.</p> <p>11 Q. From Houston?</p> <p>12 A. (Nod affirmative).</p> <p>13 Q. Okay.</p> <p>14 MS. ADEN: Was that a yes?</p> <p>15 THE WITNESS: Oh, sorry. Yes. She</p> <p>16 commuted, yes.</p> <p>17 Q. (BY MR. SEAQUIST) See, sometimes I'll forget to</p> <p>18 remind you.</p> <p>19 A. Yes. I was about to say --</p> <p>20 Q. Do you pay your own tuition at Prairie View?</p> <p>21 A. Yes.</p> <p>22 Q. Does your mom pay part of the tuition for you?</p> <p>23 A. No.</p> <p>24 Q. Are you married?</p> <p>25 A. No.</p>	<p>1 like every semester.</p> <p>2 Q. Okay.</p> <p>3 A. So I make it to go with that. So currently, on</p> <p>4 Tuesdays and Thursdays I do 6:45 to 10:00; and then</p> <p>5 Monday, Wednesday, and Friday I do 9:45 to 12:00. And</p> <p>6 sometimes I may pick up a shift if like one of my clubs'</p> <p>7 meetings gets canceled or a class gets canceled and I'm</p> <p>8 stuck on campus, so I'll just like pick up an extra</p> <p>9 shift and that will probably be like 1:45 to 6:00.</p> <p>10 Q. Okay. When you say 6:45 to 10:00, is that</p> <p>11 a.m.?</p> <p>12 A. Yes, sir.</p> <p>13 Q. Okay. And the same question for 9:45 to 12:00.</p> <p>14 Would that be a.m.?</p> <p>15 A. Yes. 12:00 p.m.</p> <p>16 Q. Do you remember what your work schedule was for</p> <p>17 the fall semester of 2018, last year?</p> <p>18 A. No, sir. I don't even remember what my class</p> <p>19 schedule was.</p> <p>20 Q. Okay.</p> <p>21 A. I remember for the spring of 2019, though.</p> <p>22 Q. For 2019?</p> <p>23 A. Huh?</p> <p>24 Q. For 2019 you remember?</p> <p>25 A. Yes, the spring of 2019.</p>
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<p>1 Q. Do you have any children?</p> <p>2 A. No.</p> <p>3 Q. Are you currently employed?</p> <p>4 A. Yes.</p> <p>5 Q. Where do you work?</p> <p>6 A. The student rec center.</p> <p>7 Q. And what's your position at the student rec</p> <p>8 center?</p> <p>9 A. Assistant.</p> <p>10 Q. How long have you been in that position?</p> <p>11 A. Two and a half years, because I started as soon</p> <p>12 as I got here.</p> <p>13 Q. So in the summer of --</p> <p>14 A. Oh, sorry. No. I started like when the actual</p> <p>15 school year started.</p> <p>16 Q. Starting in the fall of 2017?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Is that a work study position or --</p> <p>19 A. Yes.</p> <p>20 Q. How many hours a week do you work?</p> <p>21 A. 20, 22.</p> <p>22 Q. And has that been consistent since you started?</p> <p>23 A. Yes.</p> <p>24 Q. What is your work schedule?</p> <p>25 A. Well, it depends, because my schedule changes</p>	<p>1 Q. But you're not sure what your work schedule was</p> <p>2 in the fall of 2018.</p> <p>3 A. No, sir.</p> <p>4 Q. Has it typically -- when you have worked, has</p> <p>5 it typically been in the morning?</p> <p>6 A. No, because sometimes I have morning classes</p> <p>7 and I also have to stay with the times of the shuttle.</p> <p>8 Like this time I've done the 6:45 because someone lives</p> <p>9 in the same apartments as me and she works a 6:45</p> <p>10 schedule, so I can ride with her. But usually I can't</p> <p>11 take a shift until after like 8:00 because the first</p> <p>12 shuttle doesn't come until after 8:00.</p> <p>13 Q. Is the shuttle pretty reliable?</p> <p>14 A. No.</p> <p>15 Q. In what way?</p> <p>16 A. I'm usually late for class. This one</p> <p>17 professor, he had a five-minute rule. It was last</p> <p>18 spring. And his class didn't start until 1:00 p.m.; but</p> <p>19 just to be on the safe side, I would always be on campus</p> <p>20 by 11:00 or 10:00 or something because I don't want to</p> <p>21 risk like him not allowing me to come to class. Even if</p> <p>22 you tell him like it was the shuttle's fault, he's like</p> <p>23 "I don't care. I want to see documentation. And you</p> <p>24 still can't come in for the class."</p> <p>25 Q. So sometimes the shuttle runs late.</p>

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<p>1 A. Yes.</p> <p>2 MR. SEAQUIST: Okay. I'm going to mark</p> <p>3 Exhibit 1.</p> <p>4 (Exhibit No. 1 marked)</p> <p>5 Q. (BY MR. SEAQUIST) Do you recognize, Ms. Smith,</p> <p>6 what I've just handed you as Exhibit 1?</p> <p>7 A. Yes.</p> <p>8 Q. And are these the interrogatory responses that</p> <p>9 you had reviewed prior to the deposition today?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. Now, before coming to school at Prairie</p> <p>12 View A&M, were you living with your mom in Houston?</p> <p>13 A. Yes.</p> <p>14 Q. And you provided us an address of 16015</p> <p>15 Beckbridge. Is that a correct address?</p> <p>16 A. Yes.</p> <p>17 Q. And that's in Houston?</p> <p>18 A. Yes, sir.</p> <p>19 Q. All right. But it's in a part of Houston</p> <p>20 that's in Fort Bend County?</p> <p>21 A. Yes.</p> <p>22 Q. Your interrogatories say that after you turned</p> <p>23 18, you first registered to vote in Fort Bend County.</p> <p>24 Is that right?</p> <p>25 A. Yes.</p>	<p>1 Q. Do you know or were you aware of where the</p> <p>2 polling place was for the -- for your precinct for the</p> <p>3 2016 election?</p> <p>4 A. Yes. It was an elementary school like five</p> <p>5 minutes away.</p> <p>6 Q. Do you know roughly how far in distance that</p> <p>7 was?</p> <p>8 A. The walk would probably be about 20 minutes.</p> <p>9 Driving, five minutes. I don't know like exact mileage</p> <p>10 or anything.</p> <p>11 Q. Okay. Maybe a mile or two?</p> <p>12 A. I don't know. I'm not that good. Sorry.</p> <p>13 Q. That's okay.</p> <p>14 A. I don't really know mileage.</p> <p>15 Q. When did you -- let me ask you this. Do you</p> <p>16 know whether there was early voting available to you in</p> <p>17 Fort Bend County in the 2016 presidential election?</p> <p>18 A. No, I'm not exactly aware.</p> <p>19 Q. You don't know one way or the other?</p> <p>20 A. No. Sorry.</p> <p>21 Q. Okay. But you ultimately didn't vote in that</p> <p>22 election?</p> <p>23 A. No, sir.</p> <p>24 Q. Was there a particular reason why you chose not</p> <p>25 to?</p>
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<p>1 Q. All right. When did you turn 18?</p> <p>2 A. September 9th. Oh, the year. 2016.</p> <p>3 Q. And do you remember when you first registered</p> <p>4 to vote?</p> <p>5 A. Yes.</p> <p>6 Q. When was that?</p> <p>7 A. Oh, sorry. I don't remember the exact date. I</p> <p>8 just know it was before the election. And that was an</p> <p>9 election year, presidential election, so it was a big</p> <p>10 deal for everyone to register to vote, so --</p> <p>11 Q. So you registered before the election?</p> <p>12 A. Yes, sir.</p> <p>13 Q. The 2016 presidential election.</p> <p>14 A. Yes, sir.</p> <p>15 Q. Do you remember how you first registered?</p> <p>16 A. Yes.</p> <p>17 Q. What did you do?</p> <p>18 A. I went to the DPS office and I was needing an</p> <p>19 ID as well, and they asked about that and I registered</p> <p>20 to vote as well.</p> <p>21 Q. Okay. And did you ever vote in Fort Bend</p> <p>22 County?</p> <p>23 A. No, sir.</p> <p>24 Q. Did you vote in the 2016 presidential election?</p> <p>25 A. No, sir.</p>	<p>1 A. Yes, sir.</p> <p>2 Q. What was that?</p> <p>3 A. I didn't support either candidate.</p> <p>4 Q. Okay.</p> <p>5 A. But now I know that's not a good move.</p> <p>6 Q. Your interrogatories say that when you came to</p> <p>7 Prairie View, you lived at 100 University Drive,</p> <p>8 Building 45. Is that right?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Which residential hall is that or housing?</p> <p>11 A. It's the UC, Universal College. It's literally</p> <p>12 across from here.</p> <p>13 Q. The University College?</p> <p>14 A. Uh-huh. I mean, yes. Sorry.</p> <p>15 Q. But students refer to it as the UC?</p> <p>16 A. Yes, sir.</p> <p>17 Q. And that's on-campus housing, correct?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Is it a dorm or apartment style?</p> <p>20 A. Dorm.</p> <p>21 MR. SEAQUIST: I'm going to mark Exhibit</p> <p>22 2.</p> <p>23 (Exhibit No. 2 marked)</p> <p>24 Q. (BY MR. SEAQUIST) I'll hand you what I've</p> <p>25 marked as Exhibit 2.</p>

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<p>1 A. Thank you.</p> <p>2 Q. Do you recognize Exhibit 2 to be a map of the</p> <p>3 campus of Prairie View A&M University?</p> <p>4 A. Yes. This is my first time looking at an</p> <p>5 actual map, but -- not an actual map, but of the school,</p> <p>6 because I have GPS on my phone. But yeah.</p> <p>7 MS. ADEN: Gunnar, do you mind if we just</p> <p>8 take a quick break unrelated to the questions? I just</p> <p>9 want to make sure she's comfortable with something.</p> <p>10 MR. SEAQUIST: I do.</p> <p>11 MS. ADEN: You don't mind.</p> <p>12 MR. SEAQUIST: I do not mind.</p> <p>13 MS. ADEN: Okay.</p> <p>14 (Recess from 3:00 p.m. to 3:05 p.m.)</p> <p>15 Q. (BY MR. SEAQUIST) Okay. Before we went off the</p> <p>16 record, I had just handed you a copy of the campus map.</p> <p>17 And I think you had said that you had not seen this</p> <p>18 particular map before. Is that correct?</p> <p>19 A. Yes.</p> <p>20 Q. All right. And in fact --</p> <p>21 A. But I'm not denying that it's like accurate or</p> <p>22 anything.</p> <p>23 Q. Okay. I appreciate that.</p> <p>24 One thing you did say that was interesting</p> <p>25 is you said that you use your phone to locate where</p>	<p>1 reflect where you were living on campus?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Okay. For the 2017 to 2018 school year.</p> <p>4 A. Yes.</p> <p>5 Wait. 2018-2019. Wait.</p> <p>6 Q. 2017 to 2018, I think.</p> <p>7 A. Yes. Sorry.</p> <p>8 Q. That's fine.</p> <p>9 Did you have to pay a housing cost to live</p> <p>10 on campus?</p> <p>11 A. Yes.</p> <p>12 Q. Is that something you got a scholarship or</p> <p>13 grant for or is that something you had to pay for</p> <p>14 yourself?</p> <p>15 A. Yes. I mean, like nothing paid for -- the room</p> <p>16 and board was separate pay. So, yes, I had to pay for</p> <p>17 that on my own.</p> <p>18 Q. And did you receive any assistance in paying</p> <p>19 that from your mom?</p> <p>20 A. No.</p> <p>21 Q. Did you receive any assistance from anybody</p> <p>22 else in your family in terms of paying either tuition or</p> <p>23 room and board?</p> <p>24 A. Yes. My grandma helped pay for the deposit</p> <p>25 because before -- like the deposit was due in December</p>
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<p>1 you're going?</p> <p>2 A. Yes.</p> <p>3 Q. What did you mean by that?</p> <p>4 A. There's a PVAMU app and it navigates you around</p> <p>5 campus.</p> <p>6 Q. Okay. Does your phone also have a mapping app</p> <p>7 on it?</p> <p>8 A. Yes.</p> <p>9 Q. All right. You told us that you -- in the</p> <p>10 first year that you were here, you lived at the</p> <p>11 University College dorm.</p> <p>12 A. Yes, sir.</p> <p>13 Q. I don't know if you can see it. The writing is</p> <p>14 pretty small on here. But on the map, in the legend,</p> <p>15 the University College shows up as No. 7. Can you see</p> <p>16 the No. 7 on the map? And I'll help you out. It's</p> <p>17 right here.</p> <p>18 THE WITNESS: Can you show me?</p> <p>19 I'm sorry. I just can't -- that's kind of</p> <p>20 hard.</p> <p>21 MR. SEAQUIST: No, that's just fine.</p> <p>22 MS. HARRISON: So that one is No. 7.</p> <p>23 THE WITNESS: Okay. Thanks.</p> <p>24 Yes, I see it.</p> <p>25 Q. (BY MR. SEAQUIST) And does that accurately</p>	<p>1 when I was still a senior in high school.</p> <p>2 Q. Did you have a meal plan for the 2017 to 2018</p> <p>3 school year, that is, the year when you first got here?</p> <p>4 A. Yes.</p> <p>5 Q. And where does that meal plan allow you to eat</p> <p>6 on campus?</p> <p>7 A. Okay. So there's The Zone back here and then</p> <p>8 there's this place called Jazzman's Cafe next to the</p> <p>9 library and then there's the MSC, which is the student</p> <p>10 cafeteria, and there's also like snacks in the bookstore</p> <p>11 and you can use that as well.</p> <p>12 Q. And how many meals a day does that cover?</p> <p>13 A. Three days during the week, two days on</p> <p>14 weekends.</p> <p>15 Q. During your first year at Prairie View, did you</p> <p>16 ever go back home to Houston on the weekends?</p> <p>17 A. Yes, sir.</p> <p>18 Q. How often would you do that?</p> <p>19 A. The first -- September is my birthday. I went</p> <p>20 home in September. But August, there was like a storm</p> <p>21 or something like that, so everyone was kind of stuck at</p> <p>22 school. So I went back for my birthday, maybe two weeks</p> <p>23 after. But after that, it's just like a month. It goes</p> <p>24 by really fast. The month of October is homecoming.</p> <p>25 And then I just waited until the Thanksgiving break,</p>

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<p style="text-align: right;">Page 25</p> <p>1 came back. And then I went back home for the Christmas 2 break. 3 Q. For the times that you did go home, how did you 4 get there? 5 A. My mom. 6 Q. Your mom would come pick you up? 7 A. Yes, sir. 8 Q. And in terms of getting back to campus, how did 9 you get back? 10 A. My mom, she would take me. But eventually I 11 found out, which is pretty ironic, that my roommate -- 12 she lived somewhere in the same location as me; and one 13 day I caught a ride back with her, her parents, because 14 she didn't have transportation either. 15 Q. When you first got to campus in 2017, were you 16 given any information about how to register to vote as a 17 PVAMU student? 18 A. No. Well, yes. Like in what way? Like during 19 Welcome Day? 20 Q. Just -- you tell me. How did you get 21 information on how to register to vote here? 22 A. Okay. There was a speaker that came to one of 23 our classes and she said she was deputized to register 24 to vote and, if you're interested in enacting change, 25 come sign up. And then we had to fill out a voter</p>	<p style="text-align: right;">Page 27</p> <p>1 Well, she didn't go here. She didn't go here. Sorry. 2 Q. You're doing just fine. Thank you. 3 Okay. But you don't -- the woman who came 4 and advocated for Sandra Bland or spoke about voting, 5 you don't remember specifically whether she was with any 6 particular organization. 7 A. No. I said she wasn't. She wasn't. 8 Q. Okay. And so you registered to vote in the 9 fall of 2017? 10 A. Yes, sir. 11 Q. Do you remember which month you registered in? 12 A. Not exactly. I'm going to go out on a limb and 13 say September. 14 Q. And you said you filled out a card? 15 A. Yes, sir. 16 Q. Where -- did the lady who came to speak to you 17 guys give you the card or did you get the card 18 elsewhere? 19 A. She gave us the card. 20 Q. And did you register using the 100 University 21 address? 22 A. Yes, sir. 23 Q. Did you have any problems registering to vote? 24 A. No, sir. 25 Q. And did you get confirmation that your</p>
<p style="text-align: right;">Page 26</p> <p>1 registration card and she said in about two or three 2 weeks we would get something in the mail and we would be 3 eligible to vote. 4 Q. Okay. Do you remember who that speaker was? 5 A. No, sir. 6 Q. Do you remember whether she was -- you said it 7 was a she, right? 8 A. Yes, it was a she. 9 Q. Do you remember whether she was with a 10 particular group or organization? 11 A. No. But she was advocating on behalf of 12 someone. 13 Q. Okay. Do you remember who she was advocating 14 on behalf of? 15 A. Sandra Bland. I don't know if you're familiar 16 with her. She's kind of someone known around campus, 17 may she rest in peace. 18 Q. So she came to your class to speak about Sandra 19 Bland? 20 A. Well, it was about voting and the importance of 21 voting. And I guess that was more of the sympathetic 22 approach, to find like somewhere in the middle for us to 23 relate, like why is this important to us, how could this 24 affect us. And that was her way of like relating to the 25 students by using this example of someone who went here.</p>	<p style="text-align: right;">Page 28</p> <p>1 registration had been accepted as you were told you 2 would? 3 A. Yes, sir. I got a card with a yellow sticker. 4 Q. Do you know what voting precinct you lived in 5 when you were on campus at the University College? 6 A. No, sir. 7 Q. If I told you it was 309, would that ring a 8 bell for you? 9 A. No, sir. 10 Q. Okay. In reading your answer to Interrogatory 11 No. 5, which is Exhibit 1 that I gave you, you say that 12 the -- to the best of your knowledge and recollection, 13 the first election you voted in was the 2017 general 14 election. 15 A. Yes, sir. 16 Q. And is that still your recollection today? 17 A. Yes, sir. 18 Q. Do you remember -- if you need a minute to look 19 at it, that's fine. 20 A. Sorry. 21 Q. Do you remember what the subject of the 2017 22 November election was? 23 A. Yes. 24 Q. What do you remember? 25 A. They -- okay. I'm sorry if I say "they". I</p>

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<p style="text-align: right;">Page 29</p> <p>1 don't know specific names. But the elected officials in 2 position, they were proposing building a jail; and us, 3 as students, we didn't want that because we felt like it 4 would bring down the value of the university because it 5 would be near it and other reasons like, okay, we would 6 be policed more and who would fill up these jails, would 7 it be more brown and black students. 8 Like so we had concerns like that. So 9 that was the topic of that election. And it was a 10 really big deal. And we had like an entire forum in the 11 Juvenile Justice Building trying to bring awareness to 12 it and make sure students like understand how this is a 13 pressing matter. 14 Q. So you recall in 2017 -- in November of 2017 15 there was a jail bond election; is that right? 16 A. Yes, sir. 17 Q. And what do you understand a bond election to 18 be? 19 A. I don't really know. But I assume, based on my 20 understanding, to vote whether or not they will or will 21 not do it or whether or not it would be this amount of 22 money put into it or something like that. 23 Q. Do you know whether the bond election passed or 24 not? 25 A. To my knowledge, it did go through.</p>	<p style="text-align: right;">Page 31</p> <p>1 events that you had participated in leading up to the 2 election in November of 2017. And one of the things you 3 said was "We held a forum." Do you remember that 4 testimony? 5 A. That I just said like two seconds ago? 6 Q. Yes. 7 A. Yes. 8 Q. Okay. When you say "We held a forum," who is 9 the "we"? 10 A. The Panther Party. 11 Q. Anyone else? 12 A. No, sir. 13 Well, sorry. I take that back. I believe 14 members of City Council were there. 15 Q. Was the Student Government Association involved 16 in holding that forum? 17 A. SGA? I don't think so, but maybe. 18 Q. Any other organizations that you can think of 19 that were a part of that particular forum? 20 A. No, sir. There may have been -- some 21 professors may have offered extra credit to show up 22 because it was pretty full. 23 Q. It was pretty what? I'm sorry. 24 A. The room was full. Like it was really big and 25 it's kind of hard to fill that up, but it was packed.</p>
<p style="text-align: right;">Page 30</p> <p>1 Q. Do you know whether the County is building a 2 new jail facility? 3 A. I heard different reasons why. I don't know if 4 it's the truth or not because I feel like I'm just a 5 low-ranked student. They wouldn't tell us the absolute 6 truth. Some people were saying because the one they 7 have is not up to code. It's really old. 8 Q. You're talking about your understanding of the 9 reasons for why they wanted to build a new jail. 10 A. Yes. 11 Q. My question is a little different than that, 12 which is: Do you know whether, in fact, the County ever 13 began building the new jail facility? 14 A. I don't think they did. Did they? 15 Q. Did -- I can't answer questions from you. I've 16 got to ask you. 17 A. Sorry. 18 Q. That's okay. 19 A. I wasn't trying to question you. 20 Q. No. That's just fine. 21 A. I'll just look it up after. 22 Q. Okay. As far as you know, though, there's not 23 been any jail built in Prairie View? 24 A. Yes, sir. 25 Q. You had talked a little bit about some of the</p>	<p style="text-align: right;">Page 32</p> <p>1 Q. Okay. Other than that forum, were there any 2 other events that you participated in that you can 3 recall in anticipation of the election in November of 4 2017? 5 A. No, sir. 6 Q. Do you remember participating in -- well, 7 that's okay. 8 You just mentioned The Panther Party was 9 one of the organizations that participated in the forum 10 you discussed. Your interrogatories suggest that you 11 are a member of The Panther Party. Is that right? 12 A. At the time, yes. 13 Q. When did you sign up to be a member of The 14 Panther Party? 15 A. Probably like September 2017. 16 Q. And how did you find out about The Panther 17 Party? 18 A. Well, I was on the speech and debate team; and 19 I think the guy who was the president, he came and was 20 recruiting people and like giving us flyers; and I just 21 decided to show up. 22 Q. Okay. Was that Joshua Muhammad? 23 A. Yes. 24 Q. Did you attend any meetings -- do you know what 25 I'm referring to when I talk about the Waller County</p>

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<p style="text-align: right;">Page 33</p> <p>1 Commissioners Court?</p> <p>2 A. Yes, sir, I've become familiar with that.</p> <p>3 Q. Okay. Did you attend any meetings of the</p> <p>4 Waller County Commissioners Court in the fall of 2017?</p> <p>5 A. No, sir.</p> <p>6 Q. So no Commissioners Court meetings about the</p> <p>7 2017 election.</p> <p>8 A. No, sir.</p> <p>9 Q. Did you talk to or otherwise communicate with,</p> <p>10 e-mail, text, whatever, any officials or employees of</p> <p>11 Waller County in advance of the 2017 election?</p> <p>12 A. No, sir.</p> <p>13 Q. Did you advocate in any way for additional</p> <p>14 voting locations in Waller County for the November 2017</p> <p>15 election?</p> <p>16 A. No, sir.</p> <p>17 Q. Did you advocate in any way for any additional</p> <p>18 voting hours in Waller County in the November -- for the</p> <p>19 November 2017 election?</p> <p>20 A. No, sir.</p> <p>21 Q. Do you know the local chair of the Waller</p> <p>22 County Democratic party, Rosa Patlan Harris?</p> <p>23 A. No, sir.</p> <p>24 Q. You never talked to Ms. Harris to your</p> <p>25 knowledge?</p>	<p style="text-align: right;">Page 35</p> <p>1 And Panther Party can create their own</p> <p>2 separate group message. But it isn't like exclusive to</p> <p>3 only that. Like I have -- I'm in a group message every</p> <p>4 year. I have group messages for the speech and debate</p> <p>5 team, other clubs that I'm in. So there are people --</p> <p>6 Q. It's just a much cooler time than when I went</p> <p>7 to school.</p> <p>8 MS. HARRISON: Yeah, it is.</p> <p>9 THE WITNESS: Other universities have</p> <p>10 GroupMes as well, so --</p> <p>11 Q. (BY MR. SEAQUIST) Okay. You said there were</p> <p>12 flyers around. Who puts up those flyers, if you know?</p> <p>13 A. I don't know.</p> <p>14 Q. Okay. Do you know who puts up the signs at the</p> <p>15 MSC to let people know when the early -- or when the</p> <p>16 voting hours are?</p> <p>17 A. No, sir. But the sign is really tiny anyway.</p> <p>18 It's not even tall. It's like a little short sign.</p> <p>19 Q. Now, I think in your interrogatory responses</p> <p>20 you said that you did vote in the November '17 general</p> <p>21 election, the jail bond election.</p> <p>22 A. Yes.</p> <p>23 Wait. Sorry. Repeat that.</p> <p>24 Q. Did you vote in the jail bond election?</p> <p>25 A. Yes. I thought you said --</p>
<p style="text-align: right;">Page 34</p> <p>1 A. No, sir. But if she's been on this campus and</p> <p>2 had an event, probably. But I don't usually like stay</p> <p>3 after to talk. I might listen to be respectful.</p> <p>4 Q. Did you -- how did you learn of the locations</p> <p>5 and hours available for you to vote in the November 2017</p> <p>6 election?</p> <p>7 A. There were group messages and everyone was</p> <p>8 dropping them in group messages. There would be flyers</p> <p>9 around campus. And there would be a sign outside the</p> <p>10 MSC as well.</p> <p>11 Q. When you say group messages, there was</p> <p>12 reference made in an earlier deposition to GroupMe. Is</p> <p>13 that the same thing?</p> <p>14 A. Yes.</p> <p>15 Q. Okay.</p> <p>16 A. Sorry.</p> <p>17 Q. No, that's fine.</p> <p>18 Is GroupMe -- is that exclusively a</p> <p>19 Panther Party messaging box or is there one for the</p> <p>20 campus as well?</p> <p>21 A. No. There's just -- it's an app called</p> <p>22 GroupMe. Anyone can download GroupMe. And usually</p> <p>23 students, like the first day of class, they'll start a</p> <p>24 GroupMe and they may drop like due dates, answers,</p> <p>25 different things in a group message.</p>	<p style="text-align: right;">Page 36</p> <p>1 Q. Where did you vote in that election?</p> <p>2 A. The MSC.</p> <p>3 Q. Do you remember -- do you remember where in the</p> <p>4 MSC the voting was?</p> <p>5 A. Second floor. To the right there's just a</p> <p>6 building -- not a building. A room. Sorry.</p> <p>7 Q. Okay. Do you remember the day you voted?</p> <p>8 A. No, sir.</p> <p>9 Q. Do you remember roughly what time of day it was</p> <p>10 you would have gone in to vote on the jail bond</p> <p>11 election?</p> <p>12 A. No, sir.</p> <p>13 Q. Do you remember how you got to the MSC that</p> <p>14 day?</p> <p>15 A. Yes, sir.</p> <p>16 Q. How did you do that?</p> <p>17 A. Walked.</p> <p>18 Q. Do you remember whether you were coming from</p> <p>19 your housing or another classroom or a building on</p> <p>20 campus?</p> <p>21 A. I probably was coming from class or I probably</p> <p>22 was coming from eating because the cafeteria is like in</p> <p>23 the same building as the MSC, so I would just catch the</p> <p>24 elevator and go up there.</p> <p>25 Q. Got it.</p>

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<p>1 Do you remember for the November 2017</p> <p>2 election, the jail bond election, how long it took you</p> <p>3 to vote?</p> <p>4 A. It didn't take long. Probably about 20</p> <p>5 minutes.</p> <p>6 Q. Did you have any difficulty in voting in that</p> <p>7 election?</p> <p>8 A. Yes.</p> <p>9 Q. What difficulty did you have?</p> <p>10 A. In my -- the address on the voter registrations</p> <p>11 card didn't match the address on my ID. But I told</p> <p>12 her -- I said something like "I've been living here.</p> <p>13 This is like my address right now." And she went ahead</p> <p>14 and let me vote. But I think that's what took the most</p> <p>15 time was me explaining that to her.</p> <p>16 Q. So that was part of the 20 minutes you just</p> <p>17 talked about?</p> <p>18 A. Yes.</p> <p>19 Q. You think that that discussion was the biggest</p> <p>20 part of the 20 minutes.</p> <p>21 MS. HARRISON: Objection, form.</p> <p>22 Go ahead.</p> <p>23 Q. (BY MR. SEAQUIST) You can answer.</p> <p>24 A. About five to 10.</p> <p>25 Q. Okay.</p>	<p>1 for Congress and she was introduced by another club that</p> <p>2 I'm in for women in politics. So she just paid for us</p> <p>3 to go to Austin that weekend. And that was the</p> <p>4 Democratic convention.</p> <p>5 Q. Okay. What was the other club, the women in</p> <p>6 politics club?</p> <p>7 A. Ignite.</p> <p>8 Q. Are you a member or have you attended any</p> <p>9 events of the Waller County Democratic party?</p> <p>10 A. No, sir.</p> <p>11 Q. Have you -- are you a member or have you been</p> <p>12 to any events of the Waller County Democratic Club?</p> <p>13 A. No, sir. I didn't even know that existed.</p> <p>14 Q. Do you know whether there are any on-campus</p> <p>15 student Democratic or Democrat organizations?</p> <p>16 A. No, sir.</p> <p>17 Q. Did you support a particular candidate in the</p> <p>18 Democrat primary in 2018?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Do you remember who that was?</p> <p>21 A. Tawana Cadien, I think she was running for</p> <p>22 Congress. Brian Rowland, he was running for mayor. And</p> <p>23 Marian Jackson, she was running for a judge position,</p> <p>24 for reelection. So -- anyone else that I voted for?</p> <p>25 Q. Okay. Marian Jackson -- do you know a Prairie</p>
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<p>1 A. 10 and a half.</p> <p>2 Q. According to your interrogatories, the next</p> <p>3 election you had -- you voted in was the primary in</p> <p>4 March of 2018.</p> <p>5 A. Yes, sir.</p> <p>6 Q. Did you vote in the Democrat or the Republican</p> <p>7 primary?</p> <p>8 A. Democrat.</p> <p>9 Q. Do you identify as a Democrat?</p> <p>10 A. No. Well, maybe at the time I did. Not</p> <p>11 currently.</p> <p>12 Q. Okay. At the time were you a member of the</p> <p>13 Democratic party?</p> <p>14 A. No. I did go to the Democratic convention,</p> <p>15 though.</p> <p>16 Q. Which one?</p> <p>17 A. I do not remember.</p> <p>18 Q. Do you remember when you went?</p> <p>19 A. Yes. It was just in the spring. Who was</p> <p>20 running -- I don't remember.</p> <p>21 Q. The spring of what year?</p> <p>22 A. It was 2018. I think there was Congress seats</p> <p>23 up --</p> <p>24 Q. Okay.</p> <p>25 A. -- because there was a woman who was running</p>	<p>1 View A&M employee named Frank Jackson?</p> <p>2 A. I've heard of him, but I haven't had the</p> <p>3 pleasure of meeting him yet.</p> <p>4 Q. Do you know if Marian Jackson is his wife?</p> <p>5 A. Yes. Everyone keeps telling me that I should</p> <p>6 go see him.</p> <p>7 Q. Is that right?</p> <p>8 A. Yes. But I'm too busy.</p> <p>9 (Discussion off the record)</p> <p>10 Q. (BY MR. SEAQUIST) Let me follow up on that for</p> <p>11 just a minute. Why are people telling you that you</p> <p>12 should go see Mr. Jackson?</p> <p>13 A. Just because he's a good person to connect with</p> <p>14 and he's aligned with my interests and things like that.</p> <p>15 Q. Okay. Did you campaign for a candidate in</p> <p>16 2018, in the 2018 primary?</p> <p>17 A. Yes, sir.</p> <p>18 Q. What kind of campaign activities did you engage</p> <p>19 in?</p> <p>20 A. We went to Austin. Really it was during the</p> <p>21 gun reform march as well. We held up signs. We passed</p> <p>22 out flyers. We had on buttons. And when I say "we,"</p> <p>23 I'm talking about other members of Ignite. That's what</p> <p>24 we did for Tawana Cadien.</p> <p>25 For Marian Jackson, I would ask my</p>

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<p style="text-align: right;">Page 41</p> <p>1 professors if they would mind allowing professors to 2 come speak. And one professor actually made me write an 3 essay about why. So I feel like that was a form of 4 campaigning to allow her to come speak. 5 And with Brian Rowland, I would stand 6 outside the MSC and just pass out a bunch of flyers and 7 ask people to vote. 8 Q. Did you ever go do any campaigning in the City 9 of Prairie View? 10 A. No. I was not open to do door knocking. 11 Q. Did you attend or participate in any 12 election-related events leading up to the 2018 primary? 13 A. No. 14 Q. Did you participate in any voter registration 15 drives? 16 A. Oh, yes. Sorry. Yes. 17 Q. What did you do in terms of a voter 18 registration drive? 19 A. Just drop it in group messages on GroupMe, 20 telling students to come to this event, you get free 21 Scantrons. We were giving out free papers. We will 22 give out snacks if you just come register to vote, 23 telling people it takes less than five minutes. 24 Q. And when you say "we," who are you referring 25 to?</p>	<p style="text-align: right;">Page 43</p> <p>1 class? 2 A. No, sir. They didn't ask, so I didn't ask. 3 Q. Other than what you already talked about, did 4 you do any kind of get out the vote activities for the 5 November -- or excuse me, for the March primary in 2018? 6 A. No, sir. 7 Q. There was a voter-only party in April of 2018, 8 I believe. Do you remember that? 9 A. Yes. 10 Q. Did you participate in that event? 11 A. No. I don't do parties. 12 Q. Okay. Even if you didn't go to the party, did 13 you help organize it or do anything to help prepare for 14 it? 15 A. Not really. I didn't drop that in group 16 messages. I'm not a fan. I didn't really like that 17 idea, so I didn't push it. 18 Q. I know you said you don't like parties. Have 19 you heard of student parties being held in fields around 20 this area? 21 A. Absolutely, yes. 22 Q. Is that a common occurrence? 23 A. Yes. 24 Q. Do a lot of the Prairie View A&M students go to 25 those parties?</p>
<p style="text-align: right;">Page 42</p> <p>1 A. I believe that was with The Panther Party, 2 where they were having like drives and things to get 3 people registered to vote. 4 Q. What about -- apart from the voter 5 registration, did you participate in any informational 6 sessions about the election or about the primary? 7 A. No, sir. Or does the judge coming to class 8 talking -- does that count? 9 Q. That's fine. You've told us about that. But 10 anything else? 11 A. No, sir. 12 Q. Okay. And when you say the judge coming to 13 class, you specifically asked your professor if Judge 14 Jackson could come and speak to the class; is that 15 right? 16 A. Yes. I gave him more like background on her as 17 well because they're not from here, so -- 18 Q. Did -- and he ultimately approved that even if 19 he made you write an essay about it? 20 A. Yes, sir. 21 Q. And did Judge Jackson actually come and speak 22 to your class? 23 A. Yes, sir. 24 Q. Did any of the other candidates for that 25 judicial seat or for that JP seat come and speak to your</p>	<p style="text-align: right;">Page 44</p> <p>1 A. Yes. 2 Q. Do you know where those fields are? 3 A. No. I'm not that good with directions. And 4 I've been to one. 5 Q. You actually did go to one? 6 A. Yes. Around freshman year for homecoming, I 7 did go to that one. And it was at night. And right now 8 I have contacts in, but back then -- these contacts are 9 really expensive. I couldn't afford them. So at 10 nighttime -- 11 Q. You couldn't see? 12 A. -- I couldn't see anything. 13 Q. How did you get to that party? 14 A. It was this friend of mine. 15 Q. Gave you a ride? 16 A. Yes. 17 Q. Do you remember how far a drive it was to get 18 there? 19 A. I don't recall it being far. Probably about 20 like 10 minutes. But since there was so many people 21 going, it was probably backed-up traffic causing it to 22 be longer. 23 Q. Did you attend any meetings of the Waller 24 County Commissioners Court in advance of the 2018 25 primary?</p>

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<p>1 A. No, sir.</p> <p>2 Q. Did you talk to or otherwise communicate with</p> <p>3 any officials or employees of Waller County in advance</p> <p>4 of the 2018 primary?</p> <p>5 A. Yes, sir.</p> <p>6 Q. What did you -- what communications did you</p> <p>7 have?</p> <p>8 A. I mean, like if I was -- I was campaigning with</p> <p>9 them, so they would sometimes text or ask what time is</p> <p>10 my class. Like Marian Jackson, she needed to</p> <p>11 double-check what time is my class and how many classes</p> <p>12 was he allowing her to speak in.</p> <p>13 With Tawana Cadien, she had to like see if</p> <p>14 we were free to go to the event in Austin, how many days</p> <p>15 it was.</p> <p>16 And with Brian Rowland, the same thing</p> <p>17 with him. He would ask me like if I wanted to do door</p> <p>18 knocking and I was like "It's too hot. No."</p> <p>19 Q. Other than the people you were campaigning for,</p> <p>20 though, did you talk to anybody over at the County?</p> <p>21 A. No, sir.</p> <p>22 Q. Did you advocate in any way for additional</p> <p>23 voting locations in Waller County in the 2018 primary?</p> <p>24 A. No, sir.</p> <p>25 Q. Did you advocate in any way for additional</p>	<p>1 professor who has the five-minute rule and I literally</p> <p>2 had to run across campus to get to class before the</p> <p>3 five-minute rule because I didn't think it was going to</p> <p>4 take me that long to vote, but it was popular.</p> <p>5 Q. Okay. And you're -- if you need to correct</p> <p>6 something at any time, you're welcome to let me know. I</p> <p>7 want to make sure that the testimony we get today is</p> <p>8 your accurate testimony. Okay?</p> <p>9 A. Uh-huh. Thank you for allowing that.</p> <p>10 Q. So your recollection now is that you actually</p> <p>11 voted in the afternoon. And you said -- and we're clear</p> <p>12 we're talking about the primary election, right?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. And you said there was actually a crowd</p> <p>15 there because Beto O'Rourke himself came down?</p> <p>16 A. Yes. Not the actual day, but maybe like a week</p> <p>17 prior.</p> <p>18 Q. Because this was an early voting day.</p> <p>19 A. Yes.</p> <p>20 Q. Okay. And you were able to cast your ballot</p> <p>21 and make it back to class, although it was close.</p> <p>22 A. Yes.</p> <p>23 Q. Did you take any kind of a spring break trip in</p> <p>24 March of 2018?</p> <p>25 A. Yes.</p>
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<p>1 voting hours in Waller County in the 2018 primary?</p> <p>2 A. No, sir.</p> <p>3 Q. You did vote in the 2018 primary, correct?</p> <p>4 A. Yes.</p> <p>5 Q. Where did you vote?</p> <p>6 A. MSC.</p> <p>7 Q. Did you vote early or on election day?</p> <p>8 A. Early.</p> <p>9 Q. Do you remember what time of day you went to</p> <p>10 cast your ballot?</p> <p>11 A. Was this the Beto election?</p> <p>12 Q. Yes. Well, it was the primary in which Beto</p> <p>13 was in.</p> <p>14 A. Okay. Morning.</p> <p>15 Wait. Was that a morning? Sorry.</p> <p>16 Q. Do you remember how long it took you to vote at</p> <p>17 that -- at the March primary in 2018?</p> <p>18 A. So is it okay if I change my answer?</p> <p>19 Because -- I'm sorry. I just remembered that it was</p> <p>20 actually the afternoon and it was kind of busy because</p> <p>21 it was a popular election. He actually came down to our</p> <p>22 school and talked to the students.</p> <p>23 So, yeah, it was actually the afternoon.</p> <p>24 And usually it doesn't take me that long to cast a vote,</p> <p>25 but there was like actually a wait. And it was the</p>	<p>1 Q. Where did you go?</p> <p>2 A. I went with my sister and my friend to</p> <p>3 somewhere.</p> <p>4 Q. Somewhere?</p> <p>5 A. Yes.</p> <p>6 Q. Was it in Texas?</p> <p>7 A. No.</p> <p>8 Q. Okay. Was it -- so it was out of Texas?</p> <p>9 A. Yes.</p> <p>10 Q. Was it in the U.S.?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. All right. And what means of</p> <p>13 transportation did you use to get there?</p> <p>14 A. We took a Megabus or like Flixbus or something</p> <p>15 like that.</p> <p>16 Q. Okay. All right. Now, your interrogatories</p> <p>17 say that at the end of the 2018 school year, in May, you</p> <p>18 moved out of the Building 45, University College. Is</p> <p>19 that right?</p> <p>20 A. Yes. The time frame just confused me because I</p> <p>21 thought we were just talking about Beto and that was</p> <p>22 just -- sorry. I just got really confused.</p> <p>23 Q. That's all right.</p> <p>24 So we were just talking about Beto in the</p> <p>25 March primary. And so if I read your interrogatories</p>

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<p>1 correctly, it sounds to me like in May, shortly -- you 2 know, a few months after that, you moved out of the 3 University College. Is that the right time frame? 4 A. Uh-huh. 5 Q. Okay. And uh-huh is yes? 6 A. Yes. I'm so sorry. 7 Q. It's all right. 8 It says that you lived overseas through a 9 study abroad program for June and July of that year? 10 A. Yes, sir. 11 Q. Where did you go? 12 A. Chennai, India. 13 Q. And did you take that trip through an agency or 14 an entity or -- 15 A. University. 16 Q. Was it a university-sponsored trip? 17 A. Yes, sir. 18 Q. Was there a separate cost for the study abroad 19 program? 20 A. Yes, sir. It was the criminal justice 21 department that paid for it. And also there was the 22 study abroad program who gave out scholarships as well. 23 Q. Did you have to pay anything out of your pocket 24 or from family support for the study abroad program? 25 A. Yes. I had to pay for my own passport.</p>	<p>1 Building 5, No. 5304? 2 A. (Nod affirmative). 3 Q. Okay. 4 A. Personal. 5 Q. Well, only to ask you -- is that the Panther 6 Hill Apartments? 7 A. Yes, sir. 8 Q. Do you remember when you moved into the Panther 9 Hill Apartments? 10 A. Yes, sir. 11 Q. What day? Or what time frame? 12 A. I just know it was August of 2018 and it was 13 probably afternoon. I don't remember the exact date. 14 Q. Time of day -- yeah. So August of 2018, you 15 said? 16 A. Yes, sir. 17 MR. SEAQUIST: Okay. I'm marking Exhibit 18 3. 19 (Exhibit No. 3 marked) 20 Q. (BY MR. SEAQUIST) I'll hand you that document 21 as Exhibit 3. 22 A. Okay. 23 Q. Ms. Smith, I'll represent that what I've handed 24 you marked as Exhibit 3 is a Google satellite map of the 25 Prairie View area.</p>
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<p>1 Q. And you were able to do that and get a passport 2 to go? 3 A. Yes, sir. 4 Q. Okay. 5 A. Also I have a job, so -- 6 Q. When you returned from the study abroad program 7 at the end of July in 2018, did you go immediately back 8 to Prairie View or did you go home to Houston for a 9 while? 10 A. Immediately back to Prairie View. We had class 11 the next day. 12 Q. Oh, wow. Okay. 13 A. Right. 14 Q. So do you remember when you got back to Prairie 15 View for the fall semester in 2018? 16 A. Okay. The fall semester of 2018, I didn't live 17 on campus. So I was back in the City of Prairie View, 18 but not the University of Prairie View. 19 Q. Okay. Do you remember when -- okay. In your 20 interrogatories, it looks like you said that you moved 21 into a residence at 2314 Richards Road. Is that right? 22 A. That should be 23104. 23 Q. Okay. 24 A. Sorry. 25 Q. That's all right.</p>	<p>1 A. Yes, sir. 2 Q. In looking at this map -- and I know some of 3 the writing is small, so it may be hard to see. But are 4 you able to identify the Prairie View A&M campus? 5 A. Yes, sir. 6 Q. Are you also able to identify on this map the 7 Panther Hill Apartments? 8 A. Yes, sir. 9 Q. On Exhibit 3 there is a red -- it looks like a 10 balloon right next to the words "Panther Hill 11 Apartments". Does that accurately -- fairly and 12 accurately depict the location of the Panther Hill 13 Apartments? 14 A. I'm not sure. I guess. Yes, sir. 15 Q. Yes? 16 A. I mean, I don't know. Like I said, I don't 17 usually look at maps, so -- 18 Q. Well, do you know if the Panther Hill 19 Apartments are south of 290? 20 A. Yes. 21 Q. Okay. All right. If this is the Panther Hill 22 Apartments with the red dot here and this is the 23 university campus, does that appear to correctly display 24 the Panther Hill Apartments in relation to where the 25 campus is?</p>

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<p style="text-align: right;">Page 53</p> <p>1 A. Yes, sir.</p> <p>2 Q. Okay. So obviously Panther Hill is off campus,</p> <p>3 right?</p> <p>4 A. Yes, sir.</p> <p>5 Q. Do you know the distance between the Panther</p> <p>6 Hill Apartments and the edge of the campus?</p> <p>7 A. Yes, sir.</p> <p>8 Q. How far is that?</p> <p>9 A. 50 minutes, walking.</p> <p>10 Q. Okay. Did you say 50 or 15?</p> <p>11 A. 50. Walking is 50 minutes at an average pace</p> <p>12 probably.</p> <p>13 Q. Have you walked that distance before?</p> <p>14 A. No. But one time I thought I was going to have</p> <p>15 to walk, but these guys seen me and my friend and asked</p> <p>16 us if we needed a ride.</p> <p>17 Q. Okay. So in terms of saying it's 50 minutes to</p> <p>18 walk, how did you come up with that number?</p> <p>19 A. I put it in the GPS on my phone.</p> <p>20 Q. And it told you 50 minutes?</p> <p>21 A. 50.</p> <p>22 Q. Yes, five-zero.</p> <p>23 When you moved into the Panther Hill</p> <p>24 Apartments, did you update your voter registration to</p> <p>25 reflect your new address?</p>	<p style="text-align: right;">Page 55</p> <p>1 rec center like me and we both work the morning shift,</p> <p>2 so I've used her to get to work/campus because the rec</p> <p>3 center is on campus.</p> <p>4 Q. Do you know what shuttle route it is that comes</p> <p>5 by your house?</p> <p>6 A. No, sir.</p> <p>7 Q. Where does it pick up for the Panther Hill</p> <p>8 Apartments?</p> <p>9 A. Right in front of the apartments. But I know</p> <p>10 there's like different color routes, but it's confusing</p> <p>11 because, like I said, it's unreliable. Some days it</p> <p>12 will say red route, purple route, green route. But I</p> <p>13 just -- whichever one is there, I get on it.</p> <p>14 Q. When is the first shuttle in the morning?</p> <p>15 A. 7:30.</p> <p>16 Q. And what's the last shuttle dropoff in the</p> <p>17 evening?</p> <p>18 A. After 5:00 p.m. is when I try to stick to it</p> <p>19 because after that you will wait for 30 minutes to an</p> <p>20 hour because --</p> <p>21 Q. For the next --</p> <p>22 A. -- after 5:00 p.m. it goes like all over, so</p> <p>23 they're picking up every single person who doesn't have</p> <p>24 transportation. So it's like an hour wait or something</p> <p>25 like that. So it's supposed to be until 8:00 p.m., but</p>
<p style="text-align: right;">Page 54</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Do you know what voting precinct the</p> <p>3 Panther Hill Apartments fall into?</p> <p>4 A. No.</p> <p>5 Q. Okay. If I told you 310, would that ring a</p> <p>6 bell?</p> <p>7 A. No, sir.</p> <p>8 Q. Okay. Do you own a car?</p> <p>9 A. No, sir.</p> <p>10 Q. Have you had a car at any time since you've</p> <p>11 been a student at Prairie View?</p> <p>12 A. No, sir.</p> <p>13 Q. Do you have a driver's license?</p> <p>14 A. No, sir.</p> <p>15 Q. Have you ever gotten a driver's license?</p> <p>16 A. No, sir.</p> <p>17 Q. Have you, at any time since you have been on</p> <p>18 the Prairie View -- at Prairie View, owned a bicycle?</p> <p>19 A. No, sir.</p> <p>20 Q. Since moving to the Panther Hill Apartments --</p> <p>21 and you talked a little bit about this earlier. But</p> <p>22 just so the record is clear, since moving to the Panther</p> <p>23 Hill Apartments, what are the different means of</p> <p>24 transportation that you have used to get to campus?</p> <p>25 A. Shuttle. And I have a friend who works at the</p>	<p style="text-align: right;">Page 56</p> <p>1 it can drag over.</p> <p>2 Q. Okay. In 2018, once you were living over at</p> <p>3 the Panther Hill Apartments, did you keep your meal</p> <p>4 plan?</p> <p>5 A. No, sir.</p> <p>6 Q. Did you prepare and eat your meals at your</p> <p>7 apartment then after that?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Where do you shop for groceries?</p> <p>10 A. H-E-B.</p> <p>11 Q. And how far is that from your apartment?</p> <p>12 A. Driving, probably like 20 minutes.</p> <p>13 Q. Is that how you typically get there?</p> <p>14 A. Yes, sir.</p> <p>15 Q. How do you get a ride to the H-E-B?</p> <p>16 A. I usually do a trade with a friend, like "I'll</p> <p>17 buy you some food in exchange for a ride to H-E-B."</p> <p>18 Q. Is there a Walmart or a Target or something</p> <p>19 like that around Prairie View?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Do you ever go shop there?</p> <p>22 A. Yes and no. The Walmart doesn't carry meat,</p> <p>23 so --</p> <p>24 Q. Okay.</p> <p>25 A. It's --</p>

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<p>1 Q. When you go to Walmart, how do you get to</p> <p>2 Walmart?</p> <p>3 A. A shuttle goes to Walmart.</p> <p>4 Q. From your apartment or from the campus?</p> <p>5 A. Apartment. Like there's a stop like after</p> <p>6 picking up to the Walmart.</p> <p>7 Q. Is there a movie theater around here?</p> <p>8 A. I don't think so.</p> <p>9 Q. Since you've been at Prairie View have you gone</p> <p>10 to see any movies?</p> <p>11 A. Yes.</p> <p>12 Q. Where was the movie showing?</p> <p>13 A. It was like a drive-in theater this summer that</p> <p>14 I went. I don't remember where it was, but -- I don't</p> <p>15 remember. It probably is not exactly in Prairie View,</p> <p>16 but it wasn't really far. It was probably like 20 --</p> <p>17 you know what? Actually, it was in Cypress. I take</p> <p>18 that back. It was in Cypress.</p> <p>19 Q. And how did you get there?</p> <p>20 A. This guy.</p> <p>21 Q. Did you say a guy?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. Do you attend church in Prairie View?</p> <p>24 A. Yes, sir.</p> <p>25 Q. Which church do you go to?</p>	<p>1 marked as Exhibit 4.</p> <p>2 A. Thank you.</p> <p>3 Q. Do you recognize Exhibit 4?</p> <p>4 A. Yes, sir.</p> <p>5 Q. Exhibit 4 is what was produced to us. It bears</p> <p>6 the Bates label Plaintiffs 327 and 328 and represented</p> <p>7 to us to be your schedule for the fall of 2018. Can you</p> <p>8 confirm that that's what this is?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Okay. In looking at 327 and 328, what I notice</p> <p>11 is that one page is a schedule for a Monday and the</p> <p>12 other page is a schedule for a Tuesday. Do you see</p> <p>13 that?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Is it fair to say that the Monday schedule</p> <p>16 would be -- would also have been your schedule for</p> <p>17 Wednesdays and Fridays?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Okay. This was -- these were Monday,</p> <p>20 Wednesday, Friday classes, correct?</p> <p>21 A. Yes, sir.</p> <p>22 Q. And then if we look at 328, which is your</p> <p>23 Tuesday schedule, is it fair to say that this was</p> <p>24 also -- would have been the same schedule that you had</p> <p>25 on Thursdays as well?</p>
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<p>1 A. Well, I go to church, but it's not a church</p> <p>2 located here. It's called Refuge Temple Ministries.</p> <p>3 But a bus comes and picks you up.</p> <p>4 Q. Does it pick you up at your apartment or at the</p> <p>5 campus?</p> <p>6 A. The campus.</p> <p>7 Q. Have you ever been to a Prairie View City</p> <p>8 Council meeting?</p> <p>9 A. No, sir.</p> <p>10 Q. Do you know where the Prairie View city hall</p> <p>11 is?</p> <p>12 A. No, sir.</p> <p>13 Q. Do you know whether the city hall is close to</p> <p>14 the Panther Hill Apartments? Or do you have any idea</p> <p>15 about that?</p> <p>16 A. No. Is -- no, I can't.</p> <p>17 Q. Okay. Let's talk about your schedule in 2018.</p> <p>18 MS. ADEN: Do you mind if we take a quick</p> <p>19 five-minute?</p> <p>20 MR. SEAQUIST: Not a bit.</p> <p>21 (Recess from 3:53 p.m. to 4:16 p.m.)</p> <p>22 (Exhibit No. 4 marked)</p> <p>23 Q. (BY MR. SEAQUIST) All right, Ms. Smith. Before</p> <p>24 we took our late lunch break, I was about to ask you</p> <p>25 about your fall 2018 schedule and hand you what I have</p>	<p>1 A. Yes, sir.</p> <p>2 Q. Okay. And although this calendar is for</p> <p>3 December 10th and 11th of 2018, is it correct that this</p> <p>4 schedule was consistent throughout the entire fall</p> <p>5 semester of 2018?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Okay. So in looking at your schedule, your</p> <p>8 earliest class Monday, Wednesday, Friday was at 10:00</p> <p>9 a.m.; is that right?</p> <p>10 A. Yes, sir.</p> <p>11 Q. And your last class on Monday, Wednesday,</p> <p>12 Friday ended at 1:50.</p> <p>13 A. Yes, sir.</p> <p>14 Q. So on Monday, Wednesday, Friday you had no</p> <p>15 class before 10:00 or after 1:50, correct?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Do you remember what your work schedule would</p> <p>18 have been on those days, if any?</p> <p>19 A. Yes, sir.</p> <p>20 Q. What would it have been?</p> <p>21 A. 1:45 to 6:00 on Monday, Wednesdays, and</p> <p>22 Fridays. Tuesdays and Thursdays I couldn't work because</p> <p>23 that was the debate practice times at the time -- the</p> <p>24 debate practice days at the time.</p> <p>25 Q. Okay. Let me go back through that with you.</p>

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<p style="text-align: right;">Page 61</p> <p>1 You said Monday, Wednesday, Fridays you</p> <p>2 would have worked 1:45 to 6:00?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Okay. My confusion is that it looks like your</p> <p>5 last class ended at 1:50. Did you leave class early to</p> <p>6 go to work?</p> <p>7 A. No, sir. I would just be late.</p> <p>8 Q. Just late to work?</p> <p>9 How long did it take you to get over to</p> <p>10 your work from your last class at the Woolfolk Social</p> <p>11 and Political Science Building?</p> <p>12 A. Five minutes, seven at the most. I walk really</p> <p>13 fast.</p> <p>14 Q. Prior to 10:00 a.m. on Monday, Wednesday, and</p> <p>15 Fridays, did you have any activities?</p> <p>16 A. No, sir. Just to make sure I was up in time to</p> <p>17 get on the shuttle and get to class on time.</p> <p>18 Q. And you told us the first shuttle leaves from</p> <p>19 Panther Hill at 7:30?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Tuesdays and Thursdays, you said you did not</p> <p>22 work in the afternoons because you had speech and</p> <p>23 debate?</p> <p>24 A. Yes, sir.</p> <p>25 Q. What time was speech and debate?</p>	<p style="text-align: right;">Page 63</p> <p>1 a.m. on Tuesdays and Thursdays?</p> <p>2 A. No, sir.</p> <p>3 Q. Okay. In your interrogatories -- and I can</p> <p>4 point you to it, but let me just ask my question because</p> <p>5 I don't think we'll really need to look at it.</p> <p>6 You indicated you spent approximately 15</p> <p>7 hours a week during the fall semester on the speech and</p> <p>8 debate club. Is that 15 hours what you're spending now</p> <p>9 versus what you had back then or were there other -- did</p> <p>10 you spend additional time on speech and debate back in</p> <p>11 the fall of '18 other than your two one-hour sessions?</p> <p>12 A. Yes. Are we just talking about during the</p> <p>13 week, Monday through Friday?</p> <p>14 Q. Uh-huh.</p> <p>15 A. Well, Fridays are tournament days; so</p> <p>16 typically, literally, we would leave campus at about</p> <p>17 7:00, probably get to the university we're debating</p> <p>18 possibly 10:00, and it will go -- we will have like</p> <p>19 tournaments back to back until about 9:00. And then by</p> <p>20 the time we get back to campus, it's like 11:00. And</p> <p>21 sometimes we would stop to eat as a team.</p> <p>22 Q. So for the debate team, the competitions were</p> <p>23 on Fridays and you would essentially miss a whole day of</p> <p>24 school for that.</p> <p>25 A. Yes. It's considered a university-excused</p>
<p style="text-align: right;">Page 62</p> <p>1 A. It was 5:00. It started at 5:00 until -- if I</p> <p>2 would have picked up the 1:45 to 6:00, I would have been</p> <p>3 an hour late.</p> <p>4 Q. Okay. How long -- it started at 5:00? How</p> <p>5 long did it last?</p> <p>6 A. Literally just one hour. But we have a new</p> <p>7 coach now, so it's much longer.</p> <p>8 Q. Okay. But this was at the time in the fall of</p> <p>9 2018.</p> <p>10 A. Yes, sir.</p> <p>11 Q. So 5:00 to 6:00, you would have had debate.</p> <p>12 Anything after 6:00 on Tuesdays and Thursdays?</p> <p>13 A. Not like -- nothing regular. But Tuesdays and</p> <p>14 Thursdays there would be different events on campus.</p> <p>15 Like we would have talent shows. Different people would</p> <p>16 come to campus and speak. Like I think last year it was</p> <p>17 Shaun King, which is a big African-American activist,</p> <p>18 so --</p> <p>19 Q. Did you go hear Mr. King speak?</p> <p>20 A. Yes, sir. Actually, I didn't know him at the</p> <p>21 time, but everyone was talking about it, so --</p> <p>22 Q. Okay. On Tuesdays and Thursdays your first</p> <p>23 class started at 11:00 a.m.; is that right?</p> <p>24 A. Yes, sir.</p> <p>25 Q. Did you have any activities before 11:00</p>	<p style="text-align: right;">Page 64</p> <p>1 activity.</p> <p>2 Q. Sure.</p> <p>3 Had you been in the debate -- speech and</p> <p>4 debate in high school as well?</p> <p>5 A. No, sir.</p> <p>6 Q. You started that when you came to Prairie View?</p> <p>7 A. Yes, sir.</p> <p>8 Q. And is that -- I think you just said that's an</p> <p>9 activity you're still engaged in?</p> <p>10 A. Huh?</p> <p>11 Q. You're still doing it?</p> <p>12 A. Yes, sir.</p> <p>13 Q. Okay. So if I understand your speech and</p> <p>14 debate schedule, it's Tuesdays for an hour, Thursdays</p> <p>15 for an hour, and then pretty much all of Friday.</p> <p>16 A. It's on Saturday and Sunday as well, but those</p> <p>17 days are not counted, so yes.</p> <p>18 Q. All right. And you traveled to other</p> <p>19 universities for that?</p> <p>20 A. Yes, sir.</p> <p>21 Q. How did you all travel?</p> <p>22 A. A school bus.</p> <p>23 Q. I think you mentioned that you were a member of</p> <p>24 the Ignite club?</p> <p>25 A. Yes, sir.</p>

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<p>1 Q. Are there any regular meetings of the Ignite 2 club? 3 A. Wednesdays, 5:00. 4 Q. 5:00 to -- 5 A. 6:00. 6 Q. So could you do that when you were working in 7 the fall of 2018 if you worked from 1:45 to 6:00? 8 A. The job is -- I would explain it to them. I 9 have a good relationship with the managers, so I would 10 let them know I'm leaving for practice or a meeting for 11 that club. 12 Q. So if you had another activity that you needed 13 to do, you could get off of work to go do that. 14 A. If it has to do with school, because it's work 15 study, so they try to, you know, understand that school 16 is first. 17 Q. Okay. 18 A. And I could possibly get a scholarship from 19 that club. 20 Q. All right. Now, we've already talked a little 21 bit about the fact that you are a member of The Panther 22 Party. You joined it in 2017? 23 A. Currently, no, I'm not a member. 24 Q. When did you cease being a member of The 25 Panther Party?</p>	<p>1 A. No, sir. 2 Q. All right. When you were a member of The 3 Panther Party, did you pay any membership dues? 4 A. Yes, sir. 5 Q. How much did you pay? 6 A. I do not remember. I think it was between 10 7 to 15 dollars. 8 Q. Okay. Was that just in the first year that you 9 were a member? 10 A. Yes, sir. 11 Q. When you were a member of The Panther Party, 12 did you hold any kind of a special position? 13 A. No, sir. 14 Q. You weren't like an officer, president, 15 vice-president, anything like that? 16 A. No, sir. I was not a part of E board. 17 Q. Were you on any of the committees? 18 A. Yes, sir. 19 Q. Which committee were you on? 20 A. I don't remember the name of it, but it was 21 basically you go to elders' house and take out their 22 trash for them or plant things in the garden. 23 Q. Was that the community development committee? 24 A. Yeah, I think that was. 25 MS. ADEN: You've got to speak up.</p>
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<p>1 A. Summer of 2018. 2 Q. So were you a member of The Panther Party in 3 the fall, from September to December of 2018? 4 A. Yes. 5 Q. So I guess I need to clarify the dates because 6 you just told me you stopped in the summer of '18 and 7 that -- but that you were for the fall of '18. Maybe 8 I'm misunderstanding you. 9 A. Then maybe I wasn't for the fall of '18. 10 Sorry. 11 Q. Okay. But you're pretty confident that you 12 stopped being in The Panther Party in the summer of '18. 13 A. Yes. 14 Q. That was the summer that you -- 15 A. Studied abroad? 16 Q. Yes. 17 A. Yes. 18 Q. Okay. Did you -- unless you studied abroad 19 last summer, too. 20 A. No, sir. 21 Q. Okay. 22 A. By "last summer," you mean like -- 23 Q. '19, summer of '19. 24 A. Okay. 25 Q. But you did not travel abroad summer of '19.</p>	<p>1 THE WITNESS: I'm sorry. I think that's 2 what it was. 3 Q. (BY MR. SEAQUIST) But you were not on the 4 political engagement committee; is that right? 5 A. I was in that as well. I'm sorry. I don't 6 remember like the exact different names of whatever you 7 participated in in the clubs. 8 Q. Okay. 9 A. But that is how I met the mayor, the guy who 10 was running for mayor, Brian Rowland, through that club. 11 Q. Was he a member as well? 12 A. No, sir. 13 Q. Is he -- is Mr. Rowland a Prairie View student 14 or -- 15 A. No, sir. 16 Q. Okay. 17 A. I -- I don't know what he is. Well, I think 18 he's a member of City Council. 19 Q. Okay. 20 A. But I didn't -- I don't know what he does. 21 Q. In the fall of 2018, before the general 22 election in November, did you attend any voter 23 registration drives or trainings hosted by The Panther 24 Party? 25 A. No, sir.</p>

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<p>1 Q. Did you attend any get out the vote events 2 hosted by The Panther Party in advance of that 2018 3 November election? 4 A. No, sir. 5 Q. Did you attend any candidate forums in advance 6 of the 2018 November election? 7 A. I don't remember. 8 Q. That's fine. 9 So as we kind of already talked about, the 10 candidates were Beto O'Rourke. Do you remember going to 11 any forums for Beto O'Rourke? 12 A. Oh, yes. I thought we were talking about a 13 different time. 14 Q. That's okay. 15 A. Yes, I do remember. 16 Q. And Mike Siegel? Do you remember the name Mike 17 Siegel? 18 A. Yes, I remember him. 19 Q. Okay. Were both of them at a candidate forum 20 here? 21 A. I don't remember. That wasn't someone I was 22 supporting. 23 Q. Do you have social media accounts? 24 A. Yes, sir. 25 Q. Facebook?</p>	<p>1 Siegel or Beto O'Rourke in the 2018 -- 2 A. Wait. I do support -- I did support Beto. 3 Q. You did support Beto. 4 Were there any other candidates in the 5 2018 general election that you were supporting? 6 A. Not that I want to mention. 7 Q. Okay. Did you campaign for any candidates for 8 the 2018 general election? 9 A. The general election was in the spring? 10 Q. No, ma'am. In the fall, November. 11 A. Yes. 12 Q. Who did you campaign for? 13 A. Beto. 14 Q. For Beto? 15 A. (Nod affirmative). 16 Q. What did you do to campaign for Beto? 17 A. I wore his button. He gave out stickers. 18 I wore his button. He gave out stickers. 19 I would put the stickers in places where I thought 20 people would look. I posted him on social media. I 21 recorded him speaking, posted that on social media. And 22 I hashtagged like #govote, #beto. 23 Q. Okay. Did you continue to campaign for 24 Ms. Jackson or for Judge Jackson? 25 A. Yes, sir.</p>
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<p>1 A. No, sir. 2 Q. Twitter? 3 A. No, sir. 4 Q. Instagram? 5 A. Yes, sir. 6 Q. Do you follow The Panther Party on Instagram? 7 A. Yes, sir. 8 Q. You know Jayla Allen, correct? 9 A. Yes. 10 Q. Okay. She's a plaintiff in this lawsuit? 11 A. Yes. 12 Q. Is that right? 13 A. Yes, sir. 14 Q. Do you follow her on social media, on 15 Instagram? 16 A. No, sir. I know this ironic, but I don't think 17 I've ever met her since. 18 Q. Okay. To your knowledge as of today, you don't 19 know if you've ever met Jayla Allen? 20 A. No. But I hear her name a lot, I guess, since 21 we're both plaintiffs. 22 Q. Do you follow any of the County's social media, 23 the Waller County social media pages? 24 A. No, sir. I didn't know they had them. 25 Q. You told me that you didn't support either Mike</p>	<p>1 Q. Did you -- other than the candidate forum we 2 just talked about, did you attend or participate in any 3 election-related events leading up to the 2018 general 4 election in November? 5 A. No, sir. 6 Q. Participate in any voter registration drives? 7 A. No, sir. 8 Q. Go to any informational sessions about the 9 election? 10 A. No, sir. 11 Q. Okay. And I think you've already told us you 12 don't care for the voter-only parties. 13 A. No, sir. 14 Q. Okay. Did you -- in the fall of 2018 did you 15 attend any meetings of the Waller County Commissioners 16 Court? 17 A. No, sir. 18 Q. Did you advocate in any way for additional 19 voting hours in Waller County in the 2018 general 20 election? 21 A. No, sir. 22 Q. Do you have an understanding of how Waller 23 County -- well, scratch that. 24 Do you have an understanding of how voting 25 locations and hours are chosen in the State of Texas?</p>

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<p style="text-align: right;">Page 73</p> <p>1 A. No, sir, but I have assumptions.</p> <p>2 Q. Okay. Do you have any -- an understanding of</p> <p>3 how Waller County, the Commissioners Court, selects its</p> <p>4 early voting locations and hours?</p> <p>5 A. No, sir. Well, I'm not going to say my -- do</p> <p>6 you want to hear my opinion? My opinions?</p> <p>7 Q. Well, I guess my question is: Do you know one</p> <p>8 way or the other?</p> <p>9 A. I have my own opinion that I've created that I</p> <p>10 believe is based on factual evidence. They don't want</p> <p>11 the students exercising their right to vote, so they</p> <p>12 deliberately try to give them less time or make it just</p> <p>13 as inconvenient as possible and confusing. I literally</p> <p>14 think that is strategically and deliberately done.</p> <p>15 Q. Okay.</p> <p>16 A. It's any way to get less students to vote.</p> <p>17 Absolutely, yeah. That's my opinion.</p> <p>18 Q. Okay. And you testified that was an assumption</p> <p>19 about how it was done?</p> <p>20 A. Yes. Not supported by any facts.</p> <p>21 Q. How did you first learn of the location and</p> <p>22 hours for voting in the November of 2018 election?</p> <p>23 A. Group messages, GroupMe.</p> <p>24 Q. Do you remember when you first learned about</p> <p>25 the election hours or -- sorry. Let me try that again.</p>	<p style="text-align: right;">Page 75</p> <p>1 learned of the voting schedule for the 2018 general</p> <p>2 election?</p> <p>3 A. Just inconvenient times, having to make time,</p> <p>4 having to make sure I am in like -- I have arrived there</p> <p>5 to the MSC within the time of the shuttle. And if I</p> <p>6 want to sleep in, I probably can't sleep in because I</p> <p>7 need to hurry up and catch the shuttle. So, yeah, it's</p> <p>8 like, "Oh, do I want to take a nap? No, I can't take a</p> <p>9 nap because I've got to go and catch the shuttle."</p> <p>10 Q. Okay. Other than that, any concerns that you</p> <p>11 remember?</p> <p>12 A. Just inconvenient.</p> <p>13 Q. Okay.</p> <p>14 MS. HARRISON: Do you mind if we take a</p> <p>15 quick break, Gunnar?</p> <p>16 MR. SEAQUIST: No.</p> <p>17 MS. ADEN: Like a minute?</p> <p>18 MR. SEAQUIST: That's fine.</p> <p>19 (Recess from 4:38 p.m. to 4:42 p.m.)</p> <p>20 Q. (BY MR. SEAQUIST) Okay, Ms. Smith. We took a</p> <p>21 break so you could confer with counsel. We're now back</p> <p>22 on the record.</p> <p>23 Do you recall when homecoming was in the</p> <p>24 fall of 2018?</p> <p>25 A. Not the exact day. I just know it was the</p>
<p style="text-align: right;">Page 74</p> <p>1 Do you remember when you learned of the</p> <p>2 locations and hours available for voting in the 2018</p> <p>3 election?</p> <p>4 A. No, I don't remember the exact day.</p> <p>5 Q. When you saw the schedule, did you have any</p> <p>6 immediate concerns about it?</p> <p>7 A. Yes, sir.</p> <p>8 Q. What were your concerns?</p> <p>9 A. That it was only three days.</p> <p>10 Q. When you say it was only three days, what do</p> <p>11 you mean?</p> <p>12 A. Monday, Tuesday, and Wednesday.</p> <p>13 Q. Are you referring to --</p> <p>14 A. Oh, wait. Sorry. Was that the election in the</p> <p>15 spring where they did that?</p> <p>16 Q. Well, I'm asking you about your concerns about</p> <p>17 the voting hours for the November 2018 election, if you</p> <p>18 remember.</p> <p>19 A. Okay. And what about -- you're asking if I had</p> <p>20 concerns about that?</p> <p>21 Q. Yeah. When you saw the schedule, whether you</p> <p>22 had any concerns upon seeing it.</p> <p>23 A. Not -- yes.</p> <p>24 Q. Okay. And so my follow-up question then is:</p> <p>25 What were the concerns that you remember having when you</p>	<p style="text-align: right;">Page 76</p> <p>1 month of October.</p> <p>2 Q. Okay. Do you remember it being the first week</p> <p>3 of early voting --</p> <p>4 A. No, sir.</p> <p>5 Q. -- in the general election?</p> <p>6 A. No, sir.</p> <p>7 Q. Do you know one way or the other?</p> <p>8 A. No, sir.</p> <p>9 Q. Were you aware --</p> <p>10 MR. SEAQUIST: I'm going to mark Exhibit</p> <p>11 5.</p> <p>12 (Exhibit No. 5 marked)</p> <p>13 Q. (BY MR. SEAQUIST) I'll hand you what I've</p> <p>14 marked as Exhibit 5. Were you aware -- have you seen</p> <p>15 this -- have you seen Exhibit 5 before?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Okay. What do you recognize Exhibit 5 to be?</p> <p>18 A. It was Panther Party's way of providing</p> <p>19 transportation to students who did not have access to a</p> <p>20 vehicle to go and exercise their right to vote because</p> <p>21 they understood that that was the number one difficulty</p> <p>22 in students being able to vote.</p> <p>23 And since we had to compromise due to not</p> <p>24 having the same amount of voting days at the MSC, which</p> <p>25 is the most convenient place for all students, this was</p>

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<p style="text-align: right;">Page 77</p> <p>1 something that they tried to quickly come up with to 2 solve for this curve ball and inconvenience that was 3 just given to us and not like allowing us to vote, us as 4 Prairie View students. 5 MR. SEAQUIST: Objection, nonresponsive. 6 Q. (BY MR. SEAQUIST) My question is: What 7 specifically do you recognize Exhibit -- well, Exhibit 8 5 -- Exhibit 5 is a notice of a bus going from campus to 9 the courthouse in Hempstead; is that right? 10 A. Yes, sir. 11 Q. And you said a moment ago that this was The 12 Panther Party's way of providing transportation to the 13 polls; is that right? 14 A. Yes, sir. 15 Q. Do you know who actually paid for this bus? 16 A. No, sir. 17 Q. Do you know who actually hired the bus? 18 A. No, sir. 19 Q. The bus ran three times on Friday, the 26th, 20 2018? Is that right? 21 A. I'm not aware. I didn't get on the bus. 22 Q. Okay. Did you make any effort to -- well, 23 scratch that. 24 Do you know how many students ultimately 25 did ride the bus to Hempstead to vote?</p>	<p style="text-align: right;">Page 79</p> <p>1 approved by the Commissioners Court scheduled early 2 voting at the Memorial Student Center on Monday, October 3 29th, through Wednesday, October 31st, from 8:00 to 5:00 4 each day; is that right? 5 A. Yes, sir. 6 Q. Okay. And if we look -- 7 A. Wait. Was it 7:00 to 7:00 p.m.? No. 8 Q. Well, we'll talk about that. It got extended 9 to that later, but I'll ask you about that in a minute. 10 Originally it was 8:00 to 5:00. Do you remember that? 11 A. Yes, sir. 12 Q. Okay. And we discussed earlier that on Monday 13 you didn't have any commitments prior to 10:00 a.m., 14 correct? 15 A. Yes, sir. But it tended to change due to 16 October, homecoming week, the same time around midterms 17 weeks, so we may have like meet-ups to study. So 18 usually there are reviews. It's easier to do the 19 reviews before class. If the professor goes over it, 20 then we can ask him questions about something we may 21 have had trouble with. So yes. 22 Q. So by Monday, October 29th -- well, let's back 23 up. 24 Is it your testimony that homecoming 25 activities can interfere with your schedule and your</p>
<p style="text-align: right;">Page 78</p> <p>1 A. No, I -- 2 MS. HARRISON: Objection, form. 3 THE WITNESS: No, I don't. 4 Q. (BY MR. SEAQUIST) Did you go to the October 5 17th, 2018 Commissioners Court meeting? 6 A. No, sir. 7 Q. Did you at any point in the fall of 2018 talk 8 to any officials or employees of Waller County about 9 voting locations or hours? 10 A. No, sir. 11 Q. Have you ever talked to the Waller County 12 election administrator, Christy Eason? 13 A. No, sir. 14 Q. What about the county judge, Trey Duhon? Have 15 you ever spoken to him? 16 A. No, sir. 17 Q. Have you -- do you know who Commissioner Jeron 18 Barnett is? 19 A. No, sir. 20 Q. Have you ever talked to any of the County 21 Commissioners -- 22 A. No, sir. 23 Q. -- of Waller County? Okay. Of Waller County? 24 A. No, sir. 25 Q. Okay. You understand that the initial plan</p>	<p style="text-align: right;">Page 80</p> <p>1 availability to vote? 2 A. No. 3 Q. Okay. On October 29th, homecoming was over, 4 correct? 5 A. Yes, maybe. Probably, yeah. That seems really 6 late. 7 Q. When do finals start? 8 A. Finals start in December. 9 Q. When do midterms start? 10 A. Usually it's the week of homecoming. 11 Q. Okay. On October 29th at 10:00 a.m. -- excuse 12 me. On October 29th of 2018 do you remember having 13 anything prior to 10:00 a.m.? 14 A. No, sir. 15 Q. On October -- Tuesday, October 30th, 2018, do 16 you remember having anything in your schedule prior to 17 11:00 a.m.? 18 A. Not that I know of. It was awhile ago. So I 19 could have had something to do. You never know. I 20 could have had plans to eat at the MSC. I could have 21 been in the library studying. I could have been at 22 Jazzman's Cafe getting something to drink. Or I could 23 have still been in bed. 24 Q. Okay. Anything else you can think of that you 25 might have been doing at that time?</p>

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<p style="text-align: right;">Page 81</p> <p>1 A. I mean, so I know me saying that I could have 2 been in bed probably seems like I was just being lazy. 3 But I'm tired sometimes. I'm busy. So I try to like 4 get in like little mini-naps or not wake up until like 5 right before class starts, just in time to catch the 6 shuttle in time to get to class on time. So if I don't 7 have to wake up extremely early, like it's a relief. 8 Q. Okay. Anything else that you can think of you 9 might have been doing prior to 11:00 a.m. on a Tuesday, 10 on October 30th? 11 A. No, sir. 12 Q. Okay. Now, in the initial plan, the 13 Commissioners Court also provided early voting from 7:00 14 a.m. to 7:00 p.m. at the Waller County Community Center 15 on Thursday and Friday of that week, the 1st and 2nd of 16 November. Were you aware of that? 17 A. Yes, sir. 18 Q. Okay. You, I think, stated in your 19 interrogatories that you've never been to the Waller 20 County Community Center? 21 A. Yes, sir. 22 Q. Is that still true today? 23 A. Yes, sir. 24 Q. Do you know where the Waller County Community 25 Center is?</p>	<p style="text-align: right;">Page 83</p> <p>1 Hall? 2 A. Yes, sir. 3 Q. And when you went to class in Hobart Taylor, 4 did you just walk over there? 5 A. Yes, sir. 6 Q. Did you mind going to classes at Hobart Taylor 7 Hall? 8 A. Yes. No. I'm not -- where is Hobart? I think 9 that's the political science building. 10 Q. It was -- looking at your schedule for December 11 11th, a Tuesday, it looks like you had a math class, 12 Comprehensive Math Skills for Contemporary Algebra, at 13 the Hobart -- 14 A. Oh, wait. Yes, I know where that is. The 15 band. 16 Q. The what? 17 A. The band. The band. 18 Q. Are you saying band or bend? 19 A. Band. Sorry. That's -- I was just speaking to 20 myself. 21 Q. Okay. What does the band reference? 22 A. That building is usually where the band members 23 are. 24 Q. Oh, okay. I got you. 25 So did you have any problems making it to</p>
<p style="text-align: right;">Page 82</p> <p>1 A. No, sir. 2 Q. Do you know where the post office is? 3 A. No, sir. 4 Q. If you wanted to look to find out where the 5 Waller County Community Center is, what would you do to 6 go about finding that? 7 A. I would put it in on the maps on my phone. 8 Q. Did you ever do that in the fall of 2018 to 9 find out where it was to see if you might want to vote 10 there? 11 A. No, sir. 12 Q. PVAMU operates -- well, you talked a little bit 13 earlier about you ride the shuttle from your apartment 14 to school; is that right? 15 A. Yes, sir. 16 Q. There's also a shuttle route that is called the 17 campus loop that runs just around the campus; is that 18 right? 19 A. Yes, sir. 20 Q. Do you ever ride that campus loop shuttle? 21 A. No, sir. 22 Q. When you need to get somewhere on campus, from 23 Point A to B, for example, you just walk there? 24 A. Yes, sir. 25 Q. Have you ever had a class in the Hobart Taylor</p>	<p style="text-align: right;">Page 84</p> <p>1 class over at the Taylor Hall? 2 A. No, sir. 3 Q. You're not a member of the sorority or the 4 fraternity, are you? 5 A. No, sir. 6 Q. Obviously you're not a member of a fraternity. 7 I apologize. 8 The sorority? 9 A. No, sir. It's okay. 10 Q. Do you know anyone who took advantage of early 11 voting at the Waller County Community Center? 12 A. No, sir. 13 Q. Now, did you also come to learn that on October 14 24th, 2018, the Commissioners Court added additional 15 early voting hours and an additional location in the 16 City of Prairie View? 17 A. Yes, sir. 18 Q. Okay. And in doing that, I think this is what 19 you were talking about earlier. The Commissioners Court 20 actually extended the hours at the student center from 21 8:00 to 5:00 to 7:00 to 7:00 on all three days. Is that 22 something that's familiar to you? 23 A. Yes, sir. 24 Q. They also -- the Commissioners Court also added 25 Sunday voting at the Prairie View city hall from 12:00</p>

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<p>1 to 5:00. Were you aware of that?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Did you undertake any effort to look at or try</p> <p>4 to find out where the city hall was?</p> <p>5 A. No, sir. I just knew it was off campus and I</p> <p>6 didn't have a ride there.</p> <p>7 Q. Okay. Have you ever looked to see where city</p> <p>8 hall sits in proximity to the Panther Hill Apartments?</p> <p>9 A. No, sir.</p> <p>10 Q. If you had wanted to find out where the Prairie</p> <p>11 View city hall was, is that something you could have</p> <p>12 done?</p> <p>13 A. Yes, sir.</p> <p>14 Q. And how would you have done it?</p> <p>15 A. Put it into maps on my phone.</p> <p>16 Q. In your interrogatory responses, you say you</p> <p>17 were ultimately able to vote at the Memorial Student</p> <p>18 Center?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Did you vote early or on election day?</p> <p>21 A. Early.</p> <p>22 Q. And do you remember what day you voted early?</p> <p>23 A. No, sir. I feel like it was a Monday or a</p> <p>24 Wednesday.</p> <p>25 Q. Okay.</p>	<p>1 2, which is your interrogatory responses, specifically</p> <p>2 No. 7, I just want to clarify something with you.</p> <p>3 MS. HARRISON: Gunnar, I think you're</p> <p>4 referring to Exhibit 1.</p> <p>5 MR. SEAQUIST: I'm sorry. Exhibit 1 is</p> <p>6 correct.</p> <p>7 Q. (BY MR. SEAQUIST) In your Interrogatory 7, you</p> <p>8 state -- or in your response to Interrogatory No. 7, you</p> <p>9 state to the best of your knowledge and recollection,</p> <p>10 you walked to the Memorial Student Center from your</p> <p>11 housing and voted in person during the early voting</p> <p>12 opportunities in October 2018.</p> <p>13 Did you walk from the Panther Hill</p> <p>14 Apartments to vote?</p> <p>15 A. Absolutely not.</p> <p>16 Q. Okay. So that's an error in the response</p> <p>17 there; is that right?</p> <p>18 A. Yes.</p> <p>19 Q. Okay.</p> <p>20 A. I've never done that.</p> <p>21 Q. Your recollection is that you walked from your</p> <p>22 class before lunch, voted, and then went to your next</p> <p>23 class.</p> <p>24 A. Yes. Right after I got out of one class, I</p> <p>25 went to the MSC.</p>
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<p>1 A. Because, again, that professor and how he has a</p> <p>2 five-minute rule and I had to run. So that's how I</p> <p>3 remember.</p> <p>4 Q. Do you remember roughly what time of day it was</p> <p>5 when you would have voted on that Monday or Wednesday?</p> <p>6 A. I was pushing it, so it would have had to have</p> <p>7 been noon to 1:00, so right after I got out of</p> <p>8 W.R. Banks, ran to the MSC, and then took off --</p> <p>9 Q. Okay.</p> <p>10 A. -- to get to his class.</p> <p>11 Q. So you would have voted on your lunch break?</p> <p>12 A. Well, it was -- not hardly. It was literally</p> <p>13 10 minutes. But I did cross country in high school,</p> <p>14 so --</p> <p>15 Q. Okay.</p> <p>16 A. But never again.</p> <p>17 Q. How fast do you run a mile?</p> <p>18 A. Terrible.</p> <p>19 Q. All right. That's probably not a fair question</p> <p>20 for a Texan.</p> <p>21 A. I would just say terrible. I'd probably beat</p> <p>22 you, but still not great.</p> <p>23 Q. You'd definitely beat me.</p> <p>24 MS. ADEN: Touche.</p> <p>25 Q. (BY MR. SEAQUIST) Okay. If you look at Exhibit</p>	<p>1 Q. And you say it took you about 10 minutes to get</p> <p>2 from class to class?</p> <p>3 A. Less than that.</p> <p>4 Q. Okay. So in terms of the time it took you to</p> <p>5 vote, is about five minutes a fair estimate?</p> <p>6 A. Wait. I do not remember. Because this was the</p> <p>7 Beto election.</p> <p>8 Q. Uh-huh.</p> <p>9 A. And it was longer because there was more</p> <p>10 people. So I don't -- but I did get to class like at</p> <p>11 1:04, before his five-minute cutoff rule.</p> <p>12 Q. Okay.</p> <p>13 A. So -- but, yeah, you could still say it</p> <p>14 probably took about five, seven minutes.</p> <p>15 Q. Okay. Do you remember on election day the</p> <p>16 students had a march?</p> <p>17 A. Yes.</p> <p>18 Q. Did you participate in that march?</p> <p>19 A. I think I had a class during the time; but</p> <p>20 after, people were still like hanging out around like</p> <p>21 the MSC. So I was just there, but I didn't get to</p> <p>22 physically do the march.</p> <p>23 Q. Okay. You didn't actually walk in the march.</p> <p>24 A. No. I'm lazy, too, now.</p> <p>25 MR. SEAQUIST: Let's go off the record.</p>

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<p style="text-align: right;">Page 89</p> <p>1 (Recess from 5:00 p.m. to 5:09 p.m.)</p> <p>2 MR. SEAQUIST: Okay. We can go back on.</p> <p>3 Q. (BY MR. SEAQUIST) Ms. Smith, other than this</p> <p>4 lawsuit, have you ever been a party to a lawsuit before?</p> <p>5 A. No, sir.</p> <p>6 Q. Have you understood all my questions today?</p> <p>7 A. Yes, sir.</p> <p>8 Q. Okay. And have you answered them to the best</p> <p>9 of your ability?</p> <p>10 A. No, sir. One question, I'm not a hundred</p> <p>11 percent sure about it. It was the question about if I</p> <p>12 changed my address when I moved to Panther Hill</p> <p>13 Apartments.</p> <p>14 Q. Yes.</p> <p>15 A. I'm not a hundred percent sure if I did or</p> <p>16 didn't.</p> <p>17 Q. The question -- okay. You understood my</p> <p>18 question. You're just not as sure whether you did or</p> <p>19 not.</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Because the question was whether you</p> <p>22 changed or updated your voter registration at the time</p> <p>23 you moved. You said earlier that you thought you had.</p> <p>24 And now you're correcting that answer to say you're not</p> <p>25 sure?</p>	<p style="text-align: right;">Page 91</p> <p>1 deposit; and when I was ready to pay the deposit, it was</p> <p>2 already full.</p> <p>3 Q. What was the deposit for?</p> <p>4 A. An on-campus housing.</p> <p>5 Q. So you missed the deadline to pay the deposit?</p> <p>6 Is that what you're saying?</p> <p>7 A. Yes.</p> <p>8 Q. And because of that, you didn't have an</p> <p>9 on-campus housing option?</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. So we talked a little bit about Mr. Jackson and</p> <p>12 that people had advised you to meet him. And you</p> <p>13 testified that you thought that was because you might</p> <p>14 have some interests that are in align with him. What</p> <p>15 are those interests?</p> <p>16 A. Making minorities self-sufficient, fighting for</p> <p>17 the -- fighting for civil rights, as like a young</p> <p>18 student like knowing about systematic forms of racism</p> <p>19 that may exist and how I can address those things or</p> <p>20 make a difference.</p> <p>21 So those are some things that I would</p> <p>22 assume that people mean by we would be interested in</p> <p>23 some of the same things.</p> <p>24 Q. What do you do on campus to further those</p> <p>25 interests?</p>
<p style="text-align: right;">Page 90</p> <p>1 A. Yes, sir.</p> <p>2 MR. SEAQUIST: Fair enough.</p> <p>3 We'll pass the witness.</p> <p>4 THE WITNESS: And another thing.</p> <p>5 Q. (BY MR. SEAQUIST) Okay.</p> <p>6 A. With Beto, I didn't vote the day Beto came to</p> <p>7 campus and I don't know if I was confusing when I</p> <p>8 answered that. So he came prior to the early voting</p> <p>9 days.</p> <p>10 Q. Okay. And was that -- clarify for me. When</p> <p>11 Beto came, was that at the primary in the spring or did</p> <p>12 he come in the general election in November?</p> <p>13 A. I don't remember.</p> <p>14 MR. SEAQUIST: Okay. Fair enough.</p> <p>15 Now we will pass the witness.</p> <p>16 EXAMINATION</p> <p>17 BY MS. HARRISON:</p> <p>18 Q. Okay, Treasure. I'm just going to ask you a</p> <p>19 couple of quick follow-up questions.</p> <p>20 A. Okay.</p> <p>21 Q. So you testified earlier that you moved off</p> <p>22 campus for your sophomore year?</p> <p>23 A. Yes.</p> <p>24 Q. Why did you move off campus?</p> <p>25 A. Because there was a deadline to pay the</p>	<p style="text-align: right;">Page 92</p> <p>1 A. I try to get students to register to vote. I</p> <p>2 get in contact with politicians who I believe have</p> <p>3 interests that are in like the best good of not just</p> <p>4 students on Prairie View, but everyone, and not just</p> <p>5 specifically favoring.</p> <p>6 So I make kids aware of that. I try to</p> <p>7 give them examples of why voting affects them and why</p> <p>8 voting is important and how it can make a difference.</p> <p>9 Like presidential elections are like what affects us the</p> <p>10 least and we should be more concerned with local</p> <p>11 elections which affect us the most. So I do that.</p> <p>12 I'm on the speech and debate team at the</p> <p>13 school and I represent the campus in a good way. I've</p> <p>14 brought back victories.</p> <p>15 And I'm in Ignite. That represents the</p> <p>16 campus in a good way as well. There are other women</p> <p>17 in -- you know, women, we're a marginalized group, so I</p> <p>18 try to get other women who may be interested in politics</p> <p>19 and get them to join this club and let them know there's</p> <p>20 opportunities to meet and network with other women who</p> <p>21 want to put you in positions and like point you in the</p> <p>22 right direction and they have connections.</p> <p>23 So I feel like those are things that I</p> <p>24 contribute to towards the campus. I pay tuition.</p> <p>25 That's not free. That contributes to them building</p>

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<p style="text-align: right;">Page 93</p> <p>1 things on campus. And also they take a 25-dollar fee</p> <p>2 for scholarships. I don't know. So --</p> <p>3 Q. So you mentioned your involvement in some</p> <p>4 school clubs. Do you ever have to leave work early to</p> <p>5 participate in those clubs?</p> <p>6 A. Yes.</p> <p>7 Q. And when you leave work before your shifts end,</p> <p>8 are you getting paid for that time for the remainder of</p> <p>9 your shift?</p> <p>10 A. No.</p> <p>11 Q. Can you elaborate more on that?</p> <p>12 A. I have to clock out.</p> <p>13 Q. You have to clock out?</p> <p>14 A. I don't -- I don't get to -- I mean, I feel</p> <p>15 like, you know, education is first and that's the main</p> <p>16 reason I'm here, so it takes precedent over my on-campus</p> <p>17 job, so I've got to go.</p> <p>18 Q. And the club activities that you're involved</p> <p>19 in, like the speech and debate team or Ignite, does</p> <p>20 that -- I think you testified earlier that involves some</p> <p>21 travel. How much travel do you do for those clubs?</p> <p>22 A. Well, it depends on how far the university is</p> <p>23 and how far we make it in the tournament. For example,</p> <p>24 debate starts on Friday, but you get dropped; and if you</p> <p>25 make it to that Saturday, then you will be debating that</p>	<p style="text-align: right;">Page 95</p> <p>1 Q. About how much time do you think you spend in a</p> <p>2 week to do that?</p> <p>3 A. Two hours a day. I work half a day because, I</p> <p>4 mean, in debate -- I don't want to give you all a whole</p> <p>5 lesson. But you have partners and our coach may give us</p> <p>6 a topic in the group message and say "We're debating</p> <p>7 this tomorrow as a practice topic."</p> <p>8 So we will meet ahead, before practice on</p> <p>9 Wednesday, and prepare our case that we're going to be</p> <p>10 debating. And then Wednesday we'll do debate. And</p> <p>11 before practice is over, he may give us a new topic and</p> <p>12 say "Do this one on your own" and we'll make time to</p> <p>13 meet up on campus to do that.</p> <p>14 Q. So if -- if you were traveling for debate and</p> <p>15 there were early voting days that were all grouped</p> <p>16 together, one day after another, would you -- is there a</p> <p>17 chance that you would have to miss all of those early</p> <p>18 voting days because of your travel?</p> <p>19 MR. SEAQUIST: Form.</p> <p>20 Q. (BY MS. HARRISON) You can answer.</p> <p>21 A. Yes.</p> <p>22 Q. Do you know personally of students who have</p> <p>23 traveled for school purposes that have missed early</p> <p>24 voting days?</p> <p>25 MR. SEAQUIST: Form.</p>
<p style="text-align: right;">Page 94</p> <p>1 Saturday. And depending on how big the tournament is,</p> <p>2 you could be voting all the way up to Sunday.</p> <p>3 And depending on where it is -- like, for</p> <p>4 example, we had a tournament in Tennessee, so we left on</p> <p>5 Wednesday and we didn't get back until Monday night</p> <p>6 because there was a long drive. We wanted to still get</p> <p>7 some rest. And then we did really well in that</p> <p>8 tournament and we went all the way to Sunday. But if we</p> <p>9 would have lost, then possibly it would have been done</p> <p>10 by Saturday or it would have been done by Friday.</p> <p>11 So, yes, there is traveling, but the</p> <p>12 traveling varies.</p> <p>13 Q. So other than the time that you spend traveling</p> <p>14 and participating in tournaments and the scheduled</p> <p>15 one-hour Tuesday and Thursday speech meetings, do you --</p> <p>16 A. But it's changed since then, by the way.</p> <p>17 Q. The one-hour meetings have changed?</p> <p>18 A. Yes.</p> <p>19 Q. How much time do you spend now?</p> <p>20 A. Now we have a new coach, new head coach, so</p> <p>21 it's Wednesdays from 5:00 to 9:00 p.m.</p> <p>22 Q. Okay. And so other than those scheduled times,</p> <p>23 are you taking out additional time to work on your</p> <p>24 speech and debate?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 96</p> <p>1 THE WITNESS: What -- what exactly does</p> <p>2 that mean?</p> <p>3 Q. (BY MS. HARRISON) He's objecting to my</p> <p>4 question, but you can go ahead and answer it.</p> <p>5 A. Oh, okay. Yes.</p> <p>6 Q. Can you give me an example?</p> <p>7 A. Like people on the football team, again, if</p> <p>8 they like make it and they continue winning, they may</p> <p>9 have to leave and travel, so they miss early voting</p> <p>10 days.</p> <p>11 Q. So you mentioned in --</p> <p>12 A. The answer is two.</p> <p>13 Q. The answer is two? Okay.</p> <p>14 You testified earlier that in 2017 in the</p> <p>15 fall you walked to vote? Is that -- is that what you</p> <p>16 testified to earlier?</p> <p>17 A. Yes. But 2017, that's when I lived right there</p> <p>18 on campus. So when I say walk, I -- yeah.</p> <p>19 Q. So was it convenient for you to walk since you</p> <p>20 lived on campus?</p> <p>21 A. Yes.</p> <p>22 Q. Since you've moved off campus, have you walked</p> <p>23 from your housing to vote?</p> <p>24 A. No, never.</p> <p>25 Q. And you mentioned a couple of times your mom or</p>

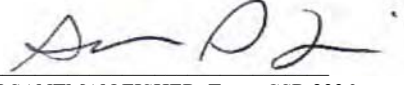
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<p style="text-align: right;">Page 97</p> <p>1 one of your friend's parents driving you to and from 2 Houston; is that right? 3 A. Yes. When she went home -- like if she was 4 going home that weekend, I could possibly ride with her 5 or ride back with her. 6 Q. And so we've talked some today about you 7 catching a ride with friends or taking the shuttle. Is 8 there any other access to transportation that you have 9 in Waller County? 10 MR. SEAQUIST: Form. 11 THE WITNESS: No, ma'am. 12 Q. (BY MS. HARRISON) Does Waller County have a 13 city bus system or public transportation system that you 14 could use? 15 MR. SEAQUIST: Form. 16 THE WITNESS: No, ma'am. 17 Q. (BY MS. HARRISON) Are there any ride-sharing 18 services, like Uber or Lyft, in Waller County? 19 A. No, ma'am. 20 Q. So you mentioned sometimes when you take the 21 school shuttle that that runs late. Do you remember 22 that testimony? 23 A. Yes, ma'am. 24 Q. Does it run on time more often or late more 25 often?</p>	<p style="text-align: right;">Page 99</p> <p>1 to pull up your official Exhibit 5. We talked about the 2 bus for the -- for the election. Is that -- yeah, 3 Exhibit 5. 4 You testified that you didn't take this 5 bus to vote; is that correct? 6 A. Yes. 7 Q. Did you associate that bus with the purpose of 8 taking students who lived off campus to vote -- did you 9 associate that with The Panther Party and its 10 organization? 11 MR. SEAQUIST: Form. 12 THE WITNESS: Yes. 13 Q. (BY MS. HARRISON) Let me reask that question 14 because I think it was a bad question. 15 Was it your understanding that The Panther 16 Party helped to organize that bus for the purpose of 17 taking students to vote? 18 A. Yes. 19 Q. You've also testified that you haven't gone to 20 any Commissioners Court or City Council meetings. Is 21 that because you lacked transportation to get there? 22 A. Yes. 23 Q. Do you know how far it would be to walk to 24 County Commissioners meetings or City Council meetings? 25 A. No. But I know the timing is usually early in</p>
<p style="text-align: right;">Page 98</p> <p>1 A. Late. Like it's -- 2 Q. Would you say that's -- 3 A. Late, like 30 minutes late, like 45 minutes 4 late. 5 Q. And so do you regularly expect it to run late 6 instead of being on time? 7 A. Yes. 8 Q. As far as your friends or family members giving 9 you a ride to the grocery store or other places that you 10 go, do they ever ask for anything in exchange for those 11 rides? 12 A. Yes. Mostly gas money. 13 Q. And I think you testified earlier that you 14 sometimes offer to pay for groceries. Are there any 15 other things that you offer besides just gas money and 16 groceries? 17 A. No. 18 Q. So we've talked some about your work study job 19 at the rec center. How close is the rec center to MSC? 20 A. Directly across, about -- as soon as I get off 21 the shuttle, a one-minute walk. 22 Q. So if you're standing outside of the rec 23 center, would you be able to see the MSC? 24 A. Yes. 25 Q. Earlier, on Exhibit 5, if you'll -- I'm going</p>	<p style="text-align: right;">Page 100</p> <p>1 the morning. It's -- no, I don't know how far it would 2 be to walk. 3 Q. And you said that the time is early in the 4 morning? The time for what? 5 A. These Commissioners meetings. 6 Q. The scheduled time for the meeting? Is that 7 what you're talking about? 8 A. Yes, ma'am. 9 Q. And there was a discussion about city hall. Do 10 you know where city hall is in Prairie View? 11 A. No, ma'am. 12 Q. So have you ever been there? 13 A. No, ma'am. 14 Q. Are you aware of a shuttle that goes to city 15 hall? 16 A. No, ma'am. 17 Q. At the beginning of your testimony today, we 18 walked kind of through your life background and a 19 little -- a few things about your family. One thing 20 that you mentioned was that neither of your parents have 21 gone to college but that your grandmother had been to 22 college. 23 Apart from your grandmother, what does it 24 mean to you to be the first one in your immediate family 25 to have gone to college?</p>

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<p>1 A. A good thing. I've never -- I didn't know I</p> <p>2 was considered to be first generation. But it's a good</p> <p>3 thing. I like the fact that I can inspire my younger</p> <p>4 siblings that they can rise above poverty lines and just</p> <p>5 something that they were born into but they didn't</p> <p>6 deserve to.</p> <p>7 And I like the fact that I can say that</p> <p>8 I'm doing something useful with my life. And I'm trying</p> <p>9 to make the most of it. I try to do things with just my</p> <p>10 actions and not just my words, so I feel like it's a</p> <p>11 bold action to be the first one to try to seek higher</p> <p>12 education.</p> <p>13 Q. Do you have plans for what you'll do after you</p> <p>14 graduate from college?</p> <p>15 A. Absolutely.</p> <p>16 Q. What are those plans?</p> <p>17 A. I want to go to law school and I want to help</p> <p>18 people who have been wrongfully convicted get</p> <p>19 exonerated.</p> <p>20 Q. So the last thing I want to touch on is you had</p> <p>21 mentioned earlier that you had some assumptions about</p> <p>22 how county officials had established voting procedures.</p> <p>23 Can you -- can you go into what those assumptions are</p> <p>24 and why you believe them?</p> <p>25 MR. SEAQUIST: Form.</p>	<p>1 MS. HARRISON: Nothing further.</p> <p>2 (Proceedings concluded at 5:26 p.m.)</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1 THE WITNESS: Because I do feel like it's</p> <p>2 a more older, white generation type of county and</p> <p>3 then -- but there's this college with mostly</p> <p>4 African-American students and they feel like it's unfair</p> <p>5 that we're here for only four years and we get to have a</p> <p>6 say in permanent decisions.</p> <p>7 But what they don't understand is, even</p> <p>8 though we're only here for four years, we want to</p> <p>9 prepare the way and pave the way for future students who</p> <p>10 will come to this institution.</p> <p>11 Just like there was a point in time where</p> <p>12 we didn't even have -- as students at Prairie View,</p> <p>13 despite us paying tuition and that tuition going into</p> <p>14 taxes and things like that, they didn't have a right to</p> <p>15 vote. And there were generations before us who fought</p> <p>16 until we got that right to vote. So now it's up to us</p> <p>17 to continue that fight and break down these barriers.</p> <p>18 MS. HARRISON: Okay. We'll pass the</p> <p>19 witness.</p> <p>20 MR. SEAQUIST: Ms. Smith, I'd just like to</p> <p>21 thank you for your time this afternoon. Good luck to</p> <p>22 you.</p> <p>23 THE WITNESS: Thank you. Are we off the</p> <p>24 record?</p> <p>25 MR. SEAQUIST: Uh-huh.</p>	<p>1 CHANGES AND CORRECTIONS</p> <p>2 WITNESS NAME: DATE OF DEPOSITION:</p> <p>3 TREASURE SMITH OCTOBER 10, 2019</p> <p>4 PAGE LINE CHANGE REASON</p> <p>5 _____</p> <p>6 _____</p> <p>7 _____</p> <p>8 _____</p> <p>9 _____</p> <p>10 _____</p> <p>11 _____</p> <p>12 _____</p> <p>13 _____</p> <p>14 _____</p> <p>15 _____</p> <p>16 _____</p> <p>17 _____</p> <p>18 _____</p> <p>19 _____</p> <p>20 _____</p> <p>21 _____</p> <p>22 _____</p> <p>23 _____</p> <p>24 _____</p> <p>25 _____</p>

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<p>1 I, TREASURE SMITH, have read the foregoing</p> <p>2 deposition and hereby affix my signature that same is</p> <p>3 true and correct, except as noted above.</p> <p>4</p> <p>5</p> <p>6 _____</p> <p>7 TREASURE SMITH</p> <p>8</p> <p>9 THE STATE OF _____)</p> <p>10 COUNTY OF _____)</p> <p>11</p> <p>12 Before me, _____, on this</p> <p>13 day personally appeared TREASURE SMITH, known to me (or</p> <p>14 proved to me under oath or through</p> <p>15 _____) (description of identity</p> <p>16 card or other document)) to be the person whose name is</p> <p>17 subscribed to the foregoing instrument and acknowledged</p> <p>18 to me that they executed the same for the purposes and</p> <p>19 consideration therein expressed.</p> <p>20 Given under my hand and seal of office this</p> <p>21 _____ day of _____, _____.</p> <p>22</p> <p>23</p> <p>24 _____</p> <p>25 NOTARY PUBLIC IN AND FOR THE STATE OF _____ COMMISSION EXPIRES: _____</p>	<p>1 I further certify that pursuant to FRCP Rule</p> <p>2 30(f)(1) that the signature of the deponent:</p> <p>3 <u>X</u> was requested by the deponent or a party</p> <p>4 before the completion of the deposition and returned</p> <p>5 within 30 days from date of receipt of the transcript.</p> <p>6 If returned, the attached Changes and Signature Page</p> <p>7 contains any changes and the reasons therefor;</p> <p>8 _____ was not requested by the deponent or a party</p> <p>9 before the completion of the deposition.</p> <p>10 That the amount of time used by each party at the</p> <p>11 deposition is as follows:</p> <p>12 MS. JULIE GOODRICH HARRISON.....0 Hours, 15 Minutes</p> <p>13 MR. GUNNAR P. SEAQUIST.....1 Hour, 48 Minutes</p> <p>14 I further certify that I am neither counsel for,</p> <p>15 related to, nor employed by any of the parties or</p> <p>16 attorneys in the action in which this proceeding was</p> <p>17 taken, and further that I am not financially or</p> <p>18 otherwise interested in the outcome of the action.</p> <p>19 Certified to by me this 20th of October, 2019.</p> <p>20</p> <p>21 </p> <p>22 _____</p> <p>23 SHERRI SANTMAN FISHER, Texas CSR 2336</p> <p>24 CSR Expiration Date: 12/31/19</p> <p>25 COOLEY REPORTING, Firm No. 702</p> <p>8407 Fathom Circle, Unit B</p> <p>Austin, Texas 78750</p> <p>512-743-5867/512-410-3012</p>
<p>Page 106</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE SOUTHERN DISTRICT OF TEXAS</p> <p>3 HOUSTON DIVISION</p> <p>4 JAYLA ALLEN, DAMON)</p> <p>5 JOHNSON, TREASURE SMITH,)</p> <p>6 AND THE PANTHER PARTY,)</p> <p>7 Plaintiffs,)</p> <p>8 VS.) CIVIL ACTION NO.:</p> <p>9) 4:18-CV-3985</p> <p>10 WALLER COUNTY TEXAS; THE)</p> <p>11 WALLER COUNTY)</p> <p>12 COMMISSIONERS COURT;)</p> <p>13 JUDGE CARBETT "TREY" J.)</p> <p>14 DUHON III, IN HIS)</p> <p>15 OFFICIAL CAPACITY AS THE)</p> <p>16 WALLER COUNTY JUDGE; AND)</p> <p>17 CHRISTY A. EASON, IN HER)</p> <p>18 OFFICIAL CAPACITY AS THE)</p> <p>19 WALLER COUNTY ELECTIONS)</p> <p>20 ADMINISTRATOR,)</p> <p>21 Defendants.)</p> <p>22 *****</p> <p>23 REPORTER'S CERTIFICATION</p> <p>24 ORAL DEPOSITION OF TREASURE SMITH</p> <p>25 OCTOBER 10, 2019</p> <p>*****</p> <p>1 I, SHERRI SANTMAN FISHER, Certified Shorthand</p> <p>2 Reporter in and for the State of Texas, hereby certify</p> <p>3 to the following:</p> <p>4 That the witness, TREASURE SMITH, was duly sworn by</p> <p>5 the officer and that the transcript of the oral</p> <p>6 deposition is a true record of the testimony given by</p> <p>7 the witness;</p>	

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